CARL H. BRADLEY
SECRETARY

WALLACE G. WILKINSON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
18 REILLY ROAD
FRANKFORT, KENTUCKY 40601

March 29, 1991

James H. Scarbrough, P.E.
Environmental Protection Agency, Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

RE: American Standard, Inc. - RFA
Jefferson County, Kentucky
EPA ID# KYD-006-375-489

Dear Mr. Scarbrough:

The Kentucky Division of Waste Management concurs with the review comments made in the letter from your agency dated February 19, 1991.

Replacement pages for the RFA report are attached. If these revisions are satisfactory, the Division will expect to receive a joint approval letter from EPA, according to the Memorandum of Agreement.

If you have any questions concerning this matter, feel free to call Geoffrey Young at 502/564-6716.

Sincerely,

Carolyn Pittsnogle for
Susan C. Bush, Director
Division of Waste Management

SCB/jls

Attachments

cc: Louisville Regional Office
Mohammad Alauddin, Branch Manager
Geoffrey Young, Permit Review Section
Pending File #90-190

American Standard Inc.
United States Plumbing Produc Group
P.O. Box 1050
Louisville KY 40201
Telephone 502 634-6100
Fax 502 634-6110

July 10, 1991

United States EPA
Region IV
345 Courtland Street, NE
Atlanta, Georgia 30365

ATTENTION: James H. Scarbrough, Chief
RCRA and Federal Facilities Branch
Waste Management Division

Susan Bush, Director
Division of Waste Management
Kentucky DEP

RE: RCRA FACILITY ASSESSMENT REPORT (RFA)
American Standard Inc.
Louisville, Kentucky
EPA I.D. No. KYD 006 375 489

Dear Sir or Madam:

This letter is in response to the referenced RFA report which was received on May 6, 1991. American Standard has reviewed this information and appreciates the opportunity to provide comments concerning several of the SWMU's and recommendations contained in the report:

- SWMU #5 - SITE OF TRASH DUMPSTER
  The trash from this area has been removed and properly disposed of.

- SWMU #6 - TEMPORARY WASTE STAGING AREA
  The floor of this building is not constructed of concrete as listed, but is constructed of wooden (tongue in groove) planking. Periodic inspections have been and continue to be conducted in this area. To the best of our knowledge, there have been no releases of material from this area.

- SWMU #8 - FORMER WASTE STAGING BUILDING
  The recommendation, as submitted, is to conduct random sampling and analysis of the powder on the floor and in the pipe chases.

  As an alternative, American Standard proposes to remove the powder from the floor and pipe chases of this building and properly dispose of it. The floor and pipe chases are constructed of wood and concrete. Samples would be taken and analyzed using the TCLP test after clean-up activities. The proposed clean-up will be scheduled for commencement during the plant summer shutdown.

- SWMU #10 - FORMER CONTAINER STORAGE AREA
  American Standard is willing to comply with this recommendation as submitted.

- SWMU #11 - INACTIVE LANDFILL
  American Standard is willing to comply with this recommendation as submitted.

- SWMU #14 - BASECOAT TANK AND DIKE
  American Standard is willing to comply with this recommendation as submitted and will begin the process during the plant summer shutdown.

If you should have any questions concerning American Standard's response, please call me at 502/634-6111.

Sincerely yours,

AMERICAN STANDARD Inc.

RONALD D. YETT
Plant Manager

RDY/jjb
cc: A. Thaw
K. Tubbs
R. Kochis
E. Reed

PHILLIP J. SHEPHERD
SECRETARY

BRERETON C. JONES
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
18 REILLY ROAD
FRANKFORT, KENTUCKY 40601

May 27, 1992

Mr. Alan Farmer
RCRA Facilities Waste Management Division
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

RE: American Standard, Inc.'s Confirmatory Sampling Plan
(RFI Workplan)
Jefferson County, Kentucky
EPA ID #KYD-006-375-489
Pending File #92-1032

Dear Mr. Farmer:

The Kentucky Division of Waste Management (KDWM) has reviewed American Standard Inc.'s Confirmatory Sampling Plan (RFI Workplan)submitted April 27, 1992. Enclosed is the KDWM's comments on the above cited document.

American Standard submitted a sampling plan because the facility will be closing in December of 1992. American Standard would like to start the project in June. A response to this letter would be appreciated at your earliest convenience.

If you have any questions regarding this matter contact Scott Johanson at (502) 564-6716, extension 620.

Sincerely,

Caroline P. Haight
Director
Division of Waste Management

MA/sj/ssh

Attachment

cc: Louisville Regional Office
Henry Rezvanian
Scott Johanson
Pending File #92-1032

COMMENTS ON CONFIRMATORY SAMPLING PLAN
(RFI WORKPLAN)
AMERICAN STANDARD

(1) SWMU #8 - Former Waste Staging Building

a) Since the former waste staging building has had the enamel powder removed from the surface of the floor and pipe chase, the building is in need of a confirmatory sampling investigation to prove that it has been decontaminated correctly.

b) How will the background levels of the constituents be established for this location? How will they be collected? Where will they be collected?

c) How will the confirmatory samples be collected?

(2) SWMU #10 - Former Container Storage Area

a) It should be noted that all stained areas (regardless of how many) should be sampled. The reason for this is that by sampling only three areas some constituents could be missed.

b) Will additional samples be taken at deeper locations if contamination is indicated at the surface? Will samples be taken laterally from surface samples which show contamination?

c) More sampling locations need to be selected, so that a better sample set can be evaluated. With only three samples some of the contaminated areas could be overlooked.

d) Where will the background location sample(s) come from? The background samples are necessary to determine if the contaminant levels are natural, coming from another source or are coming from the unit. What type of sampling technique will be used?

(3) SWMU #11 - Inactive Landfill

a) Sampling should continue downward until the natural soil is reached. The natural soil should be collected to determine if contamination has entered the natural soils.

b) Will additional samples be taken at deeper intervals if contamination is indicated at the surface? Will samples be taken laterally from surface samples which show contamination?

c) All soil borings should be logged in detail so that cross

characteristics; and

C. How the soils and geologic formations affect the hydrogeology of the area.

(8) General Comments

A. Figure 2 (site map) needs to indicate the following:

a. Property lines, with the owners of all adjacent property clearly marked;

b. Topography and surface drainage (with a contour interval of 2 feet) depicting all drainage patterns and surface-water containment areas; and

c. All known past and present product and waste underground tanks or piping.

B. When testing for HSO concentration the sampler must be sure that bag is chemically compatible, or decomposition chemicals from the bag could give a false reading.

C. A Data Management Plan must be submitted with the plan.

D. A contingent plan needs to be set up which plans out the steps used to install a groundwater monitoring system. This plan must be used if widespread soil contamination is discovered at SWMUs #10 and #14. This sample plan should include the following:

a. well installation procedures
b. well development procedures
c. well sampling procedures
d. decontamination procedures
e. preservatives used and types of containers used
f. schedules for installation and sampling times

E. Since SWMU #11 the inactive landfill is a land based unit, a groundwater monitoring plan must be set up for this unit.

American Standard Inc.
United States Plumbing Produc Group
P.O. Box 1050
Louisville KY 40201
Telephone 502 634-6100
Fax 502 634-6110

July 10, 1991

United States EPA
Region IV
345 Courtland Street, NE
Atlanta, Georgia 30365

ATTENTION: James H. Scarbrough, Chief
RCRA and Federal Facilities Branch
Waste Management Division

Susan Bush, Director
Division of Waste Management
Kentucky DEP

RE: RCRA FACILITY ASSESSMENT REPORT (RFA)
American Standard Inc.
Louisville, Kentucky
EPA I.D. No. KYD 006 375 489

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If you should have any questions concerning American Standard's response, please call me at 502/634-6111.

Sincerely yours,

AMERICAN STANDARD Inc.

RONALD D. YETT
Plant Manager

RDY/jjb
cc: A. Thaw
K. Tubbs
R. Kochis
E. Reed

CARL H. BRADLEY
SECRETARY

WALLACE G. WILKINSON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
18 REILLY ROAD
FRANKFORT, KENTUCKY 40601

September 14, 1990

Mr. James Scarbrough
U. S. Environmental Protection Agency
345 Courtland Street
Atlanta, GA 30365

RE: Draft RFA Report
American Standard, Jefferson County
EPA ID# KYD-006-375-489

Dear Mr. Scarbrough:

Enclosed please find one original draft RFA report for the American Standard facility in Louisville, Jefferson County, Kentucky. The ID# is KYD-006-375-489.

Please review this draft and return it with your comments as per the current Memorandum of Agreement.

If you have any questions, feel free to call Geoffrey Young at 502/564-6716, ext. 295.

Sincerely,

M. Alauddin

Mohammad Alauddin, Manager
Hazardous Waste Branch

MA/GY/JLS

Attachment

cc: Pending File #90-190

COMPLIANCE EVALUATION INSPECTION
June 19, 1991

INSPECTOR AND AUTHOR OF REPORT
Kenneth L. Hahn, Envir. Inspector III
Louisville Regional Office

HANDLER NAME, ID NUMBER AND STREET ADDRESS
American Standard, Inc.
KYD00-637-5489
1541 South Seventh Street
Louisville, Kentucky 40208

FACILITY MAILING ADDRESS
P.O. Box 1050
Louisville, Kentucky 40201

OWNER OF INSTALLATION
American Standard, Inc.
1114 Avenue of the Americas
New York City, New York 10036

RESPONSIBLE OFFICIAL
Ronald D. Yett, Plant Manager

CONTACT PERSON ON LATEST REGISTRATION
Robert Dunlap
(502) 634-6100

REGISTERED ACTIVITIES
Full Quantity Generator
Closed Interim Status Facility for Treatment Subject to Corrective Action for Waste Management Units
Other Recycling for Enamel Powder Recovery

RCRIS ACTIVITIES AND FACILITY PORTIONS
Full Quantity Generator
T04 Other Treatment
T01 Tank
S02 Container

INSPECTION PARTICIPANTS
Kenneth Hahn, Div. of Waste Management
Erwin L. Reed, American Standard, Inc.
Janice McMonigal, American Standard, Inc.

DATE AND TIME OF INSPECTION
June 18, 1991 at 1:45 p.m.
June 19, 1991 at 8:52 a.m.

APPLICABLE REQUIREMENTS

401 KAR Chapters 30, 31, 32, 34, 37, 38, 39 and 40
Sections 6 and 7 of 401 KAR 35:020
401 KAR 35:030
401 KAR 35:040
401 KAR 35:180
401 KAR 34:060, Section 12
Interim Status Permit issued on August 28, 1981

PURPOSE OF INSPECTION

The purpose of the inspection was to determine the handler's compliance with the applicable regulations as set forth above in the Applicable Requirements section. This inspection is specified in the FY 1991 RCRA grant as a non-land TSD facility. Verification of facility units and status of units was required.

This was an unannounced inspection. This inspection was also a Compliance Schedule Evaluation of the previously cited violations which have not been corrected by any inspections.

CHECKLISTS USED

The following checklists were completed:
Interim Status Facility Report

FACILITY DESCRIPTION

The Facility Narrative is found in the report dated June 19, 1991.

FINDINGS

The inspection began with a presentation of the inspection credentials to the proper on-site authority. A brief explanation of the purpose of this inspection was given. The inspection then proceeded with a records review followed by a physical plant tour. A brief exit review was conducted with a discussion of the preliminary findings. This report generally follows the checklist.

RECORDKEEPING REVIEW

Records were reviewed June 18 and 19, 1991.

WASTE ANALYSIS. Section 4 of 401 KAR 35:020 require the facility to comply with the requirements in this section. Appropriate waste analyses records as required by Section 2 of 401 KAR 32:010, Section 1 of 401 KAR 32:040, and Section 7 of 401 KAR 37:010 were on file. The analyses records show that the

wastes have been correctly identified. TCLP testing was conducted July 3, 1990. Analyses were reviewed for the foundry, the baghouse dust, porcelain enamel powder, enamel mill room, enamel shop, and the cleaning house.

These analyses are being performed as required.

ANNUAL REPORTS. The required Generator Annual Reports for the years 1990, 1989, and 1988 were on file. Facility Annual Reports for 1985 and 1980 were on-site. Verification of the Annual Reports is discussed under the discussion of the manifest review. Documentation of the distribution of these Annual Reports to the County Judge/Executive as required by Section 2 of 401 KAR 32:040 was on-site. According to the documentation, copies of the Annual Reports were sent to the County Judge/Executive on February 27, 1991 and February 24, 1989.

The Annual Report requirements are being followed.

HANDLER SELF-INSPECTION. The inspection requirements are in Section 6 of 401 KAR 35:020, Section 1(4) of 401 KAR 32:040, and Section 5 of 401 KAR 35:180. The inspections are conducted daily and weekly. The inspection schedule dated September 27, 1985 does not address inspection of spill equipment. A detailed review of the inspection records was conducted as follows: daily baghouse dust area records from May 1, 1991 to June 18, 1991; weekly container accumulation records dated February 28, 1991, March 8, 1991, March 14, 1991, March 22, 1991, March 29, 1991, April 5, 1991, April 11, 1991, April 19, 1991, April 26, 1991, May 3, 1991, May 10, 1991, May 17, 1991, May 27, 1991, May 31, 1991, and June 7, 1991; and monthly fire equipment records. The required retention of all these inspection records was verified.

These inspection requirements are being followed except that:

1. There is no written schedule describing the frequency of contingency plan equipment inspection.

2. The written inspections for the fire equipment which is conducted monthly does not contain the time inspection was conducted or who conducted the inspection.

3. There is no written inspection log for the two-way radios or the front end loaders. This equipment is listed in the contingency plan.

PERSONNEL TRAINING. The hazardous waste personnel training records are specified in Section 5 of 401 KAR 32:030, and Section 7 of 401 KAR 35:020. The last training sessions were conducted on June 20, 1990, February 1, 1990, February 16, 1989, and December 27, 1987. The review of the personnel training documents consisted of (a) a written training program, (b) written job title descriptions, and (c) a list of personnel requiring training and their job titles. These personnel training requirements are being followed.

The previous inspector had conducted personnel training reviews and did not cite this handler for the gap between December 27, 1987 and February 16, 1989. Thus, this inspector notices the gap.

CONTINGENCY PLAN. The contingency plan was reviewed.

Plan Content. The content of the contingency plan is specified in Section 3 of 401 KAR 35:040. The content requirements are being followed except that the list of emergency coordinators is not current. Robert Dunlop left this company April 2, 1990, but he is still listed as the first coordinator. His replacement Ervin Reed started May 28, 1991, but Mr. Reed has not received his required personnel training and cannot qualify as a coordinator until trained and he meets all of the qualifications enumerated in Section 6 of 401 KAR 35:040.

Plan Records. Additional contingency plan requirements specify that records showing the distribution of the contingency plan and the information on releases and implementation reports be on-site. These additional requirements of Sections 4(2) and 7(1)(b) of 401 KAR 35:040 are being followed.

Emergencies. The standards which are applicable in an emergency are specified in Section 7(1) through (5) of 401 KAR 35:040. These emergency requirements are being followed.

Emergency Coordinator's Actions. If there has been a release, fire or explosion, the emergency coordinator's actions are specified in Section 7(7), (8) and (9) of 401 KAR 35:040. These emergency coordinator requirements are being followed.

Plan Reports. A written contingency plan implementation report must be submitted within fifteen (15) days after the incident to the Kentucky Division of Waste Management. This report shall contain data specified in Section 7(10) of 401 KAR 35:040. These report requirements are being met. Two implementation reports are on-site. The March 21, 1985 spill involved a spill of number 2 diesel fuel on the roof of Building #5 with a discharge to the MSD sewers. The second report dated July 5, 1989, also involved the release of number 2 diesel fuel.

Plan Amendment. Section 5 of 401 KAR 35:040 specifies the conditions under which the contingency plan must be amended immediately. The amendment provisions are being followed except that when the primary coordinator resigned, the plan was not revised immediately and redistributed. The last revision was dated July 24, 1990. The primary coordinator left this handler April, 1991.

Emergency Coordinator. Section 6 of 401 KAR 35:040 specify the authority and knowledge requirements for all emergency coodinators. These emergency coordinators' provisions are being followed.

Plan Maintained. Section 4(1) of 401 KAR 35:040 requires the up to date plan be maintained on-site. These contingency plan requirements are being followed except that, as noted under **Plan Content** and **Plan Amendment**, the plan is not up to date.

MANIFESTS. All outgoing manifests from January 23, 1991, to June 5, 1991 were reviewed. Manifest document numbers 00485 through 00503 for out-bound shipments were reviewed. The data required by 401 KAR 32:100 has been inserted. The requirement for proper completion of a manifest as specified in 401 KAR 32:100 are being followed.

This facility never accepted wastes from off-site. Thus, there were no incoming manifest to review.

The 1990 manifests are consistent with the 1990 Annual Report data. Manifest exception reports, if required, are on file. The manifests to Osco, Kyana Oil and Allworth matched the data on the 1990 Annual Report. A manifest exception report is required when the original copy has not been received within forty-five (45) days of each hazardous waste shipment leaving the generator. No exception reports were required.

The rentention of manifests for at least three (3) years was verified. There are no shipments to or form a foreign country. No manifests to or from a foreign country were observed. Copies of manifests going to Kentucky TSD facilities were obtained for verification when Kyana Oil and Safety-Kleen Corporation (Louisville) are inspected.

LAND RESTRICTED WASTES. 401 KAR Chapter 37 and 40 CFR Part 268 contain the requirements for land restricted waste. 401 KAR 37:040 and Subpart D of 40 CFR Part 268 contain a listing of treatment standards expressed as concentration of waste extracts or as specific technologies. 401 KAR 37:030 and Subpart C of 40 CFR Part 268 establish dates by which specific hazardous wastes cannot legally be placed in a land disposal unit and establish any conditions or exemptions to the prohibition. Section 3 of 401 KAR 37:010 and 40 CFR 268.3 prohibit any dilution of a land restricted waste. The land restricted waste notices and certifications, as required by Section 7 of 401 KAR 37:010 and 40 CFR 268.7, are filed with the corresponding manifest, contained the required data and are being maintained.

No wastes have been certified as meeting the applicable treatment standards. There is no evidence in the waste location records or elsewhere that land restricted waste is on-site for more than one year.

Besides checking land restricted waste notice with the 1991 manifests, notices were reviewed in detail for facilities listed on the 1990 Generator Annual Report which were not used in 1991. These facilities were Allworth, Inc., Peoria Disposal and Osco.

OPERATING RECORDS. The operating records, are specified in Section 4 of 401 KAR 35:050. These operating record requirements are being followed except as previously cited in the preceding detailed record review.

CONDITIONS APPLICABLE TO ALL PERMITS. The standardized records, documents and amendments are specified in Section 1 of 401 KAR 38:030 (effective 3-10-88). The closure cost estimate was last revised on September 4, 1986 in 1986 dollars. The permit and relevant correspondence, personnel training records, operating records, and management documents of each permitted unit are on-site and available. These standard conditions as specified are being met except as noted already in the previously discussed record review.

PHYSICAL INSPECTION

The physical inspection was conducted in the afternoon of June 19, 1991. The areas were inspected as follows: Foundry, Enamel Mill Room, Cleaning House and Enamel Shop.

OPERATIONS CONSISTENT WITH REGISTRATION. In order for the operations to be consistent with the latest registration (see Section 3 of 401 KAR 32:010), the data on the notification form must be complete and up to date. The consistent operational requirements are being followed except that the listed contact person Robert Dunlop resigned April 2, 1991. A revised notification form signed and dated June 17, 1991 was seen changing the contact person to Ervin Reed. This annual form was awaiting the issuance of a check.

CONTAINER ACCUMULATION AREAS. The accumulation area standards for containers are specified in Section 5(1) and (2) of 401 KAR 32:030, 401 KAR 35:030, and 401 KAR 35:180.

On the date of the physical inspection, there were the following amounts of waste by accumulation areas (as found in the Facility Narrative) on-site with dates ranging from June 5, 1991 through June 19, 1991:

1. 25 fifty-five gallon containers of enamel powder (D008).

2. 13 bags of cupola baghouse dust (D006 and D008).

3. 14 bags contain bags (D006) and filter press/filter cake (D006 and D008).

All of these containers were being accumulated in the Enamel Shop. The waste as described in the Facility Narrative was found at these container accumulation areas. These container accumulation area physical requirements are being followed.

SATELLITE ACCUMULATION AREAS. The satellite accumulation area requirements are contained in Section 5(3) of 401 KAR 32:030 and Sections 2, 3 and 4(1) of 401 KAR 35:180. The following points of generation described in the Facility Narrative were being used as satellite accumulation areas: one for cupola bags, one for cupola baghouse dust, one on the 5th floor of Enamel Mill

Room, two on the 3rd floor of Enamel Mill Room, two on the 1st floor of Enamel Mill Room, one filter cake in basement of Cleaning House, eight for the Enamel Shop, and one for floor sweeping in the Enamel Shop, and one for floor sweeping in the Enamel Shop.

These satellite accumulation area requirements are being followed.

TANK ACCUMULATION AREAS. The use of tanks for generator accumulation was not observed or found during this inspection.

GENERAL FACILITY REQUIREMENTS. 401 KAR 35:020 and 401 KAR 35:030 require the facility to comply with the requirements in the general facility requirements.

Operations Consistent with Part A. The Part A application specifies which hazardous waste can be in each regulated unit. These requirements are being followed assuming that the analyses in the Facility Narrative dated June 19, 1991 are correct.

It is assumed that all permitted TSD portions are now closed but that Interim Status was not terminated.

Security. Section 5 of 401 KAR 35:020 require the facility to prevent the unknowing entry, to have either continuous surveillance or a fence which completely surrounds the active portions of the facility, to have a means of control entry at all times through gates or other controlled entrances, to have signs "DANGER - UNAUTHORIZED PERSONNEL KEEP OUT" posted at each entrance and in sufficient numbers to be seen from any approach to the active portion, and to have the signs legible from a distance of twenty-five (25) feet. These security requirements are being followed.

Facility Maintained to Prevent Releases. The areas where hazardous waste are managed must be maintained and operated to minimize the possibility of fire, explosion or release. These requirements of Section 2 of 401 KAR 35:030 are being followed.

Required Equipment. The required equipment (i.e., internal alarm systems or internal communications, phone/radio for outside assistance, fire extinguishers, fire extinguishing systems, spill control equipment, decontamination systems, etc. must be on-site.

These requirements of Section 3 of 401 KAR 35:030 are being followed except that the inspection of this equipment as cited in the Self-Inspection of Recordkeeping is not being recorded properly.

Testing and Maintenance of Equipment. All communications and alarm systems, fire protection equipment, spill control equipment and decontamination equipement, where required, must be tested and maintained to assure its proper operation. These requirements of Section 4 of 401 KAR 35:030 are being followed except as described under Self-Inspection.

Access to Communication. Immediate access to communication must be available when hazardous waste is being poured, mixed or handled. These requirements of Section 5 of 401 KAR 35:030 are being followed.

Aisle Space. The aisle space must be adequate to allow unobstructed movement of personnel, fire protection equipment spill control equipment and decontamination equipment. These requirements of Section 6 of 401 KAR 35:030 are being followed.

Ignitable, Reactive or Incompatible Wastes. When ignitable and reactive wastes are being handled, smoking and open flames are to be in designated areas, "NO SMOKING" signs shall be posted in conspicuous places and accidential ignition or reaction prevented. These requirements of Section 7(1) of 401 KAR 35:020 are being followed.

Hazardous waste must not be placed in an unwashed unit that previously held incompatible waste or material. These requirements of Section 7(2) of 401 KAR 35:020 are being followed.

Location Standards. Hazardous waste is not placed in salt domes, salt bed formations, underground mines or caves. These requirements of Section 9 of 401 KAR 35:020 are being followed.

OTHER FINDINGS

TRANSPORTER. No evidence was found or observed showing that this handler is an off-site hazardous waste transporter. This handler only moves hazardous waste on-site.

RECYCLABLE MATERIALS USED IN A MANNER CONSTITUTING DISPOSAL. No evidence was found or observed showing that this handler uses recyclable materials in a manner constituting disposal as regulated under 401 KAR 36:030.

HAZARDOUS WASTE FUEL. No evidence was found or observed showing that this handler markets hazardous waste fuel directly to a burner or burns hazardous waste fuel on-site as regulated under 401 KAR 36:040.

USED OIL FUEL. No evidence was found or observed showing that this handler markets used oil fuel directly to a burner or burns used oil fuel on-site as described in 401 KAR 36:050.

RECYCLABLE MATERIALS USED FOR PRECIOUS METAL RECOVERY. No evidence was found or observed showing that this handler uses recyclable materials for precious metal recovery on-site as regulated in 401 KAR 36:060.

SPENT LEAD ACID BATTERIES BEING RECLAIMED. No evidence was found or observed showing that this handler either reclaims spent lead acid batteries on-site or opens spent lead acid batteries on-site as regulated under 401 KAR 36:070.

OTHER RECYCLING. No evidence was found or observed showing that this handler uses distillation columns for the recovery of spent solvents or engages in any other recycling activity.

STATUS OF VIOLATIONS CITED IN PREVIOUS INSPECTIONS
Previous violations which were discovered during Compliance Evaluation Inspections or Compliance Schedule Evaluations lack actually demonstrated compliance dates. The inspections on the following dates cited violations that do not have an actual demonstrated compliance date: January 22, 1987 and January 7, 1985.

ONGOING VIOLATIONS. There are no violations which remain as ongoing violations.

RESOLVED VIOLATIONS. The following violations have been resolved:

1. During the inspection of January 22 and 23, 1987, this handler was found in violation for generating hazardous waste which was not on the registration, for training that was fourteen months apart and open discharges to the sewers.

2. During the inspection of January 7, 1985, this handler was found in violation for registration not being consistent with the operation.

NEW VIOLATIONS

The violations discussed in the report are based on the assumption that all permitted facility portions are closed. The following violations were observed during this inspection:

1. There is no written schedule describing the frequency of inspection in violation of Section 6(2) of 401 KAR 35:020, Section 5 of 401 KAR 32:030, and Section 4 of 401 KAR 35:030.

2. The written inspections for the fire equipment did not contain the time of the inspection or the inspector's name in violation of Section 6(4) of 401 KAR 35:020.

3. There were no written inspection logs for the two-way radios or the front-end loaders (these items are listed in the contingency plan) in violation of Section 6(2)(a) of 401 KAR 35:020.

4. When the primary coordinator terminated employment, the contingency plan was not immediately amended to have an up-to-date list of emergency coordinators in violation of Sections 3(4), 5(4), and 4 of 401 KAR 35:040.

5. Thirty (30) days after April 2, 1991, a violation of Section 3(4) of 401 KAR 32:010 began because of the departure of the designated contact person on the notification form. A revised notification was observed with a signature dated June 17, 1991.

Unless otherwise noted above, these violations shall be corrected by August 15, 1991.

Documentation shall be maintained on-site proving that all the violations cited in this evaluation have been correct. This documentation must contain the date when each violation was corrected. Any violation may result in penalties found in KRS 224.994. Each violation is a separate offense. Each day a violation continues constitutes a separate violation of KRS Chapter 224 and the regulations. Meeting the compliance dates specified above shall not constitute a waiver or suspension of the penalties in KRS 224.994.

PREPARED BY

Kenneth L. Hahn — 7/25/91

Kenneth Hahn, Envir. Inspector III — Date
Louisville Regional Office

APPROVED BY

_____ — _____

Lesley Henney, Environmental Control Supervisor — Date
Louisville Regional Office

KHA:dm

NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DIVISION OF WASTE MANAGEMENT

INTERIM STATUS HAZARDOUS WASTE FACILITY REPORT

FACILITY NAME: American STANDARD, INC. EPA ID NUMBER: KYD00 - 637 - 3459
TYPE OF OPERATION: Manufacter of Sanitary - WARE
COUNTY: Jefferson DATE: 6/19/91 TIME: See CEI ROUTINE ☒ FOLLOW-UP ☒

I. RECORDKEEPING INSPECTION ITEM	CITE*	C	NC	NA	COMMENTS
1. Hazardous waste determination/analysis record	32:020 § 2	✓			
2. General waste analysis	35:020 § 4	✓			
3. Generator annual report submitted/maintained	32:040 § 1 & 2	✓			
4. Facility annual report submitted & maintained	35:050 § 6	✓			
5. Inspection requirements:	35:020 § 6				
(a) Adequate schedule developed	35:020 § 6(2)		✓		See CEI Dated 6/19/91
(b) Inspections conducted and recorded	35:020 § 6(2)		✓		
(c) Remedial actions taken	35:020 § 6(3)	✓			
(d) Records maintained	35:020 § 6(4)	✓			
6. Personnel training requirements:	35:020 § 7				
(a) Adequate training program developed	35:020 § 7(1)	✓			
(b) Training conducted by qualified person	35:020 § 7(1)	✓			
(c) Employees completely trained	35:020 § 7(2)	✓			
(d) Required personnel records	35:020 § 7(4)	✓			
(e) Records maintained	35:020 § 7(5)	✓			
7. Contingency plan requirements:	35:040				
(a) Actions described	35:040 § 3(1)	✓			
(b) Arrangements described	35:040 § 3(3)	✓			
(c) Emergency coordinator information	35:040 § 3(4)		✓		
(d) List of emergency equipment	35:040 § 3(5)	✓			
(e) Evacuation plan, if needed	35:040 § 3(6)	✓			
(f) Distribution	35:040 § 4		✓		
(g) Notification of release	35:040 § 7(4)	✓			
(h) Implementation report submitted & kept	35:040 § 2 & 7	✓			
(i) Maintained at facility	35:040 § 4	✓			
8. Arrangements with local authorities	35:030 § 7	✓			
9. International shipments	32:050 § 1 - 9				None
10. Generator manifest:	32:020	✓			
(a) Required information	32:100	✓			
(b) Manifest executed properly	32:020 § 3 & 4	✓			
(c) Manifest maintained	32:040 § 1	✓			
(d) Exception report submitted & maintained	32:040 § 3 & 1	✓			
11. TSD manifest requirements:	35:050				No off-site movement.
(a) TSD manifest execution	35:050 § 2				
(b) Manifest discrepancies	35:050 § 3				
(c) Unmanifested waste report	35:050 § 7				
(d) Foreign source notification	35:020 § 3				
12. Incoming waste records	35:050 § 4	✓			

*All regulatory cites are from Title 401 of the Kentucky Administrative Regulations. The number preceding the colon is the chapter reference. The number appearing after the colon is the regulation number. The symbol "§" is a reference to the section. For example, the reference to 32:010 § 3 should be read 401 KAR 32:010, Section 3. These citations are not comprehensive and other regulations may be applicable.

"C" means compliance with the requirement; "NC" means non-compliance with the requirement; and "NA" means the requirement is not applicable at this time.

INTERIM STATUS HAZARDOUS WASTE FACILITY REPORT

FACILITY NAME: American Standard, Inc DATE: 6/19/91

I. RECORDKEEPING INSPECTION ITEM	CITE*	C	NC	NA	COMMENTS
13. Groundwater monitoring records	35:050 § 4			✓	
14. Waste location records	35:050 § 4	✓			
15. Closure/post-closure cost estimate	35:050 § 4	✓			
16. Land disposal restricted wastes:	Chapter 37	✓			
(a) Determination/analysis	37:010 § 7	✓			
(b) Dilution prohibited in lieu of treatment	37:010 § 3	✓			
(c) Notice with restricted waste shipment	37:010 § 7	✓			
(d) Certification for restricted wastes that can be land disposed without further treatment	37:010 § 7			✓	None
(e) Restricted wastes not stored beyond 1 yr.	37:050 § 2	✓			

II. ACCUMULATION INSPECTION ITEM	CITE	C	NC	NA	COMMENTS
1. Operations consistent with notification	32:010 § 3	✓	✓		See CEI dated 6/19/91
2. Accumulation period - 90 days, 180 days or 270 days if shipped 200 miles and < 6,000 kg	32:030 § 5	✓			
3. Use & management of containers:	32:030 § 5	✓			
(a) D.O.T. packaging	32:030 § 1	✓			
(b) "Hazardous Waste" marking	32:030 § 5(1)	✓			
(c) Accumulation start date	32:030 § 5(1)	✓			
(d) Condition of containers	35:180 § 2	✓			
(e) Compatibility of waste with containers	35:180 § 3	✓			
(f) Management of containers	35:180 § 4	✓			
(g) Ignitable or reactive waste management	35:180 § 6	✓			
(h) Incompatible waste management	35:180 § 7	✓			
(i) "Satellite" accumulation in container(s)	32:030 § 5	✓			
4. Use & management of tanks for SQGs:	35:190 § 12				
(a) Ignitable, reactive & incompatible waste management	35:190 § 12(2)				
(b) Compatibility of waste or reagents with tank or inner liner	35:190 § 12(2)				
(c) 2 ft. freeboard or diversion structure	35:190 § 12(2)				
(d) Waste cutoff or by-pass system	35:190 § 12(2)				
(e) Daily inspections	35:190 § 12(3)				
(f) Weekly inspections	35:190 § 12(3)				
(g) Closure	35:190 § 12(4)				
(h) Ignitable or reactive waste management	35:190 § 12(5)				
(i) Incompatible waste management	35:190 § 12(6)				
(j) "Hazardous Waste" marking	32:030 § 5(1)				

II. FACILITY INSPECTION ITEM	CITE	C	NC	NA	COMMENTS
Operations consistent with Part A	38:020 § 2	✓			
Security	35:020 § 5	✓			
Facility maintained/operated to prevent releases	35:030 § 2	✓			
Required equipment	35:030 § 3	✓	✓		See Inspection Requirements in CEI dated 6/19/91
Maintenance & operation of required equipment	35:030 § 4	✓	✓		
Access to communications	35:030 § 5	✓			
Adequate aisle space maintained	35:030 § 6	✓			

INTERIM STATUS HAZARDOUS WASTE FACILITY REPORT

FACILITY NAME: American Standard, Inc. DATE: 6/19/91

IV. ATTACHMENTS

Container Facility Report	☐	Tank Report	☐	Thermal Treatment Facility Report	☐
Surface Impoundment Report	☐	Landfill Report	☐	Land Treatment Facility Report	☐
Waste Pile Report ☐ U I C Well Report ☐		Incinerator Report	☐	Hazardous Waste Fuel Marketer Report	☐
Chemical, Physical & Biological Treatment Facility Report	☐			Hazardous Waste Fuel Burner Report	☐

V. GENERAL INFORMATION							COMMENTS
1. Photographs taken?	YES	☐	NO	☒	N/A	☐	
2. Samples collected?	YES	☐	NO	☒	N/A	☐	
3. Previous non-compliances corrected?	YES	☒	NO	☐	N/A	☐	

VI. COMMENTS INCLUDING REMEDIAL MEASURES AND EXPECTED CORRECTION DATES

Land Restricted Waste Report attached
See CEI dated 6/19/91 for details.

VESTIGATOR'S SIGNATURE Peter L. Hulse TITLE Env. Inspector III

hereby acknowledge receipt of a copy of this report and further acknowledge that I have been advised of the screpancies and alleged violations noted during the inspection.

ENERATOR'S SIGNATURE Mailed Returned TITLE

ND RESTRICTED WASTE REPORT

PAGE 5 OF 5

CILITY NAME: American Standard, Inc. DATE: 6/19/91

PA WASTE NUMBER	ANALYSIS OR KNOWLEDGE	WW NWW	TREATMENT METHOD	MEETS STANDARD	DATE REGULATED	FACILITY USED	VAR.
0001	A & K	NWW	T63	N	8/8/90	Allworth, Inc. TND98-192-019 Mt. Pleasant, TN	N
1008	A & K	NWW	D81 T21	N	8/8/90	Peoria Disposal Landfill ILD00-680-592 Peoria, Ill	N
1(K)	A & K	NWW	T4C	N	8/8/90	OSCO TN-98-057-577 Columbia TN	N

AND RESTRICTED WASTE REPORT

ACILITY NAME: American Standard, Inc. DATE: 6/19/91

EPA WASTE NUMBER	ANALYSIS OR KNOWLEDGE	WW NWW	TREATMENT METHOD	MEETS STANDARD	DATE REGULATED	FACILITY USED	VAR.
D001 D039	A+K	NWW	S02	N	40 CFR D001 8/8/98	Safety-Kleen Corp KYD09-157-465	N
D008 D006	A+K	"	T50 T31	N	8/8/90	Envirite Corp OHD98-056-8992 Canton, Ohio	N
D008	A+K	"	T50 T30	N	8/8/90	"	N
D008 D006	A+K	"	T50 T30	N	8/8/90	"	N
D001	A+K	NWW	S01, T50 M061	N	8/8/90	KYANA OIL INC. KYD00-092-1942	N
D001 polyurethane	A+K	NWW	S01, T50	N	8/8/98	"	N
D002 Sulfuric Acid	A+K	NWW	S01, T50	N	8/8/90	"	N
D002 potassium OH	A+K	NWW	S01	N	8/8/90	"	N
D002 amine	A+K	NWW	S01	N	8/8/90	"	N
D002 11, Trichloro	A+K	NWW	S01	N	11/8/86	"	N

FACILITY NARRATIVE

AUTHOR AND DATE OF REVISION

Kenneth L. Hahn, Environmental Inspector III
Louisville Regional Office
June 19, 1991

HANDLER NAME, ID NUMBER AND STREET ADDRESS

American Standard, Inc.
KYD00-637-5489
1541SouthSeventh Street
Louisville, Kentucky

OWNER

American Standard, Inc.
1114 Avenue of the Americas
New York City, New York 10036

REGISTERED ACTIVITIES

Full Quantity Generator
Other Recycler

GENERAL BACKGROUND

American Standard located at 1541 South Seventh Street, Louisville, Kentucky manufactures sanitary ware consisting of bath tubs, sinks and urinals.

The company has approximately 57 Air Pollution permits. This handler also had one PCB transformer over 500 ppm which was removed in February 1991. Ten transformers containing 50-499 ppm PCB's are still in use.

The following is a brief outline of facility status at this handler.

DATE	ACTIONS RELATED TO FACILITY STATUS
09/29/80	Part A dated which qualifies for Interim Status for 4,000 gallons container storage (S01) and for 350 gallons tank storage (S02), using federal form
03/04/81	Date signed of a revised Part A on a Kentucky form and a federal form which would allow treatment by removing chrome from chrome plating wastewater (F006)
06/19/81	Date signed Part A deleting the waste oil storage in tanks (S02)
02/26/81	Handler requested withdrawal of Part A
08/16/82	Division (under RCRA Phase I authorization) approves withdrawal of Part A; facility status, thus, ended

DATE	ACTIONS RELATED TO FACILITY STATUS
09/21/82	Brass plating operations closed/ thus no more F006 possible
11/17/82	Division issued a NOV on financial assurance
01/08/85	Division issued a NOV since handler treating waste without a hazardous waste treatment permit (baghouse dust being mixed with nonhazardous waste)
06/28/85	Agreed Order executed requiring a modified Part A for treatment of cupola baghouse dust (D008)
07/12/85	Part A dated for treatment
08/21/85	Signed date on closure plan of treatment unit
02/04/86	Effective date of Section 1 of 401 KAR 34:060 and Section 3 of 401 KAR 38:020 which made facilities closed under Interim Status subject to corrective action for waste management units
02/13/87	Date of third and final revision to the closure plan
04/13/87	Closure plan approved by Division
11/19/87	Closure certification approved by the Division
05/02/91	RFA for waste management units requiring more investigation of some units and identification of 15 total units.

This handler has maintained continuous manufacturing operations at the same location since the late Nineteenth Century. Employment of personnel had peaked around 3,000 persons. By 1991, the number of employees had plummeted to 300 persons.

Since 1980, this handler has at numerous times had either active or inactive facility status. The following is a brief synopsis of the facility status:

PROCESSES AND WASTE STREAMS

FOUNDRY. The process starts in the foundry with pig iron and scrap iron being conveyed to the water shell cooled Cupola. Coke and limestone are added to the iron. Molten metal is produced from this process. The molten metal then goes to a holding furnace then to casting where it is poured into molds made of sand which have been fixed by a pattern. The foundry typically generates the following:

1. Analyses (D006) and Pb (D008) on Cupola Baghouse dust and bags (D008 and D006) show hazardous characteristics for Cd. There is one satellite drum under the bags for spillage. The floor in the baghouse is known to have spillage. The analyses were dated 4/3/89 and for TCLP 7/3/90. The baghouse dust had been going to Four County landfill. Rochester, Indiana (IND000780544). This landfill has been closed. On 5/8/89 the company started shipping the baghouse dust to Envirosafe Services of Ohio, 876 Otter Creek Road, Oregon, Ohio (OHD04-524-3706). The 720 bags which are changed once a year have been going to Envirosafe Services of Ohio. One load has been rejected due to pH on the bag. In 1991, this waste was being sent to Envirite Corp., Canton, Ohio (OHD98-056-8992).

2. Slag from the molten metal is conveyed to a pit, quenched, then removed to the sand pile. The slag has been going to Outer Loop #056.28 with a permit modification approved November 20, 1989. Neither the slag nor the slag quench is hazardous, slag analysis done on 7/19/89 shows it to be non-hazardous. The slag quench analysis done on 4/27/89 shows lead at .21 mg/l, Cr at 2.12 mg/l and Cd at 0.001 mg/l. It is discharged to Metropolitan Sewer District.

3. Sand is reclaimed. It first goes to the basement; then is conveyed to the Mueller where it is mixed. Once it can no longer be used the sand and cores which are made up of sand are conveyed to the sand pile for disposal under a permit modification at Outer Loop landfill #056.28. Analysis done on the sand on 7/19/89 shows Pb at 1.22 mg/l and Cd at 0.006 mg/l.

4. Lubricating oils were picked up by Consolidated Recycling of Indiana. Analysis of the oil shows no PCB's and no halogens on 7/13/89. Currently these oils go to Kyana Oil, Louisville, Kentucky, KYD00-082-1942.

5. There are five wet rotoclones which produce a sand sludge. The ventilation filtration catches the wet sand, lets it dry out. It is then put into the sand pile and goes out under a permit modification to Outer Loop landfill, #056.28. Analysis done on 5/10/89 shows F.P. at 162°F, Pb at 0.05 mg/l. The supernatant goes back into the rotoclone.

6. Empty drums (see Section 7 of 401 KAR 31:010) plant wide are used as raw material for the Cupola.

ENAMEL MILL ROOM. The plant manufactures its own enamel powder. This operation begins in Building 32 on the fifth floor where raw materials are stored. Also reclamation of the enamel powder begins here with reclaimed powder being dropped through two chutes to the seive rooms on the fourth floor, one for color and one for white. (Note: this site is registered as an other recycler). Raw material is also stored on the fourth floor. On the third floor batching takes place. Raw materials are stored in hoppers. Smelting takes place on the second floor. The glass cooling operation associated with the smelting produces a discharge water to Metropolitan Sewer District with Pb at .16 mg/l. (Analysis done 2/10/88). On the first floor are three ball mills in Building 32 and in connecting Building #7 are eight ball mills. These ball mills grind the glass into a powder. (Note: Powder escapes into the buildings from the ball mills and from reclamation and raw material handling. The company has several satellite drums set up in both buildings to place the fugitive powder. Vacuums are also used.).

CLEANING HOUSE. The sanitary ware is then conveyed to the cleaning house, Bldg. #57 where they go through a blast machine and grinding operations. The Pang born Dust collector is associated with the blast machine. The dust has been going to the sand pile along with the grinding dust from five baghouses. This dust has been going to Outer Loop landfill, #056.28. Analysis done on the grinding operation on 8/26/85 shows lead at 0.41 mg/l on the tubs and lead at 0.025 mg/l on the small ware. Analysis is pending on the Pang born.

From the grinder the sanitary ware goes to the Basecoat slush booth for a spray coating consisting of frit, soda ash and clay. This coating is recycled through a close loop system producing a filter cake which is hazardous (D008). Analysis done on 5/15/89 and for TCLP on 7/3/90 show hazardous levels for Pb (D008). It formerly went to Envirosafe Services of Ohio (OHD04-524-3706) and Four County landfill (IND000780544). Note the

company has experienced equipment malfunction of this closed loop system/oosing slush and have made arrangements to ship the waste to Osco, Inc. 408 Santa Fe Trail, Columbia, Tennessee (TND980515779). The filter press and filter cake are located in the basement of Building #57. There is one satellite drum area upstairs by the Basecoat Slush Booth (D008) for dirty clothes.

From the slush booth the ware goes to a dryer. From the dryer it is conveyed to the Enamel Shop.

ENAMEL SHOP. The enamel shop is located in Building #83. Sinks are put into the furnaces on the left hand side of the building with tubs put into the furnaces on the right. Prior to being put into the furnace, enamel powder is sifted onto the sanitary ware. Powder that is spilled is reclaimed from ten feet to the furnace. Outside of ten feet the powder is declared a hazardous waste (D008). Analysis done on 4/03/89 and for TCLP on 7/3/90 show the waste to be hazardous for Pb (D008). The waste powder goes to Envirite Corp., Canton, Ohio, OHD98-056-8992, T50, T30. From the furnace the ware goes to a cooling line and then inspection. From there it goes to the warehouse. There are from one to fourteen satellite drums for the D008 powder located in Building 83.

ACCUMULATION AREAS

Historically there were accumulation areas found in Buildings 62, 85, 92, 57 and 115. Building #62 currently is the sole accumulation area as follows:

1. There is a waste drum accumulation area in Building #62 for D008, D006 baghouse dust for floor sweepings.

2. There is a waste shipping bag accumulation area in Building #62 for D008 enamel powder and D006 and D008 baghouse dust.

3. Cupola Baghouse bags are accumulated in Building #62.

4. Empty 55-gallon containers are kept as the need arises by Building 92 and 57 for basecoat slush.

(Note: Satellite drums containing dust and powder have a plastic liner. When full these bags are placed in the shipping bags which hold approximately 3000 lbs. The oldest date on the drums is placed on the shipping bag.)

SATELLITE ACCUMULATION AREAS

1. Satellite drums for the D008 powder in Buildings #7 and #32 are as follows:

Building #7 - 6 drums
Building #32: 1st floor - 3 drums
2nd floor - 3 drums
3rd floor - 4 drums
4th floor - 5 drums
5th floor - 3 drums

This waste goes to Envirosafe Services of Ohio (OHD045243706).

2. There are 2 drums for D006 and D008 powder located in Building #74, called the basecoat smelting room. One of these drums is attached to the basecoat grinder.

3. There is one drum in the Sodium Nitrate Building #66 used for floor sweepings and truck sweepings when the product comes in. The company states the sodium nitrate is not hazardous but ships it with the D008 powder.

4. There are two satellite drums in the Ball Clay storage area located between Building #66 and #74. The company states the clay is not hazardous but ships it with the D008 powder.

5. There are two satellite drums for D008 powder located in Building 62 for floor sweepings.

6. Safety-Kleen part washers are in the following locations:

Building 16 - 3 parts washers
Building 17 - 2 parts washers
Building 18 - 1 parts washers

This waste goes to the Safety-Kleen Corporation, Louisville, Kentucky, KYD09-151-4653 as D001 and D039.

KHA:dm

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION FOR ~~AIR QUALITY~~ WASTE MANAGEMENT
FRANKFORT, KENTUCKY 40601

NOTICE OF VIOLATION

To: American Standard, Inc.
P.O. Box 1050
Louisville, KY 40201

Date of Violation: June 19, 1991
County: Jefferson
I.D. #(if applicable): KYD00-637-548

This is to advise you that, because of the circumstances noted below, you are in violation of the provisions of ☒ KRS 224, ☐ KRS 151, ☐ KRS 223, ☐ KRS 146, ☐ _____
Regulation(s) See CEI dated 6/19/91
The extent of the violation(s) observed is as follows: See CEI dated 6/19/91

Required action for remedial measures include, but are not limited to: See CEI dated 6/19/91

Violations of the above cited Kentucky Revised Statutes are subject to the maximum penalty of $10,000 per day for each ~~air quality~~ violation.
To respond to this Notice of Violation, write to:

Department for Environmental Protection
Division for ~~Air Quality~~ WASTE MANAGEMENT
400 Sherburn LANE, SUITE 301
LOUISVILLE, KY 40207

Attention: Kenneth Hahn, or call (502) 588-4254

Signatures: Kenneth L. Hahn Title: Env. Inspector Date: 7/29/91
_____ Title: _____ Date: _____

Name of person or persons to whom copy was delivered:
Erwin L. Reed Title: _____ Date: _____
_____ Title: _____ Date: _____

How Delivered: ☒ Certified Mail- P 138 865 099 ☐ Personal Service

DEP4025A
(5/88)

PAGE 1

STATE KENTUCKY DATABASE
TSD UNIVERSE DATA FOR KY

RUN 04/23/91, TIME 13.45.08 BY LINDA SHEAR
UNIVERSES CALCULATED 04/23/91, 13.35.4

****

ALLIED DRUM SERVICE, INC. KYD041167396 LOUISVILLE

UNIVERSES - LAND: X STR/TRT: X INCIN: LDG: X SDG: TRANS:

SOURCE: S TSD IND.: X REG. STATUS: R SOURCE DATE: 90/06/26

LAND	S03 R	VERIF.	WASTE PILE	22.200	CUB.YARDS
STR/TRT	S01 R	VERIF.	CONTAINER	55,945.000	GALLONS

SOURCE: A TSD IND.: X REG. STATUS: R SOURCE DATE: 91/02/25

STR/TRT	S01 U	UNVERIF.	CONTAINER	55,945.000	GALLONS

****

AMERICAN STANDARD, INC. KYD006375489 LOUISVILLE

UNIVERSES - LAND: STR/TRT: X INCIN: LDG: X SDG: TRANS:

SOURCE: S TSD IND.: X REG. STATUS: R SOURCE DATE: 89/01/29

STR/TRT	T01 B	VERIF.	TANK	130.000	GAL./DAY
	S01 B	VERIF.	CONTAINER	5,500.000	GALLONS

SOURCE: A TSD IND.: X REG. STATUS: R SOURCE DATE:

STR/TRT	T04 U	UNVERIF.	OTHER TREATMENT	8.000	GAL./DAY
	T01 U	UNVERIF.	TANK	130.000	GAL./DAY
	S01 U	UNVERIF.	CONTAINER	5,500.000	GALLONS

****

AMERICAN SYNTHETIC RUBBER CORP KYD006382857 LOUISVILLE

UNIVERSES - LAND: STR/TRT: X INCIN: LDG: X SDG: TRANS:

SOURCE: S TSD IND.: X REG. STATUS: R SOURCE DATE:

STR/TRT	S01 B	VERIF.	CONTAINER	5,500.000	GALLONS

SOURCE: A TSD IND.: X REG. STATUS: R SOURCE DATE: 80/11/19

STR/TRT	S01 B	VERIF.	CONTAINER	5,500.000	GALLONS
	S02 L	UNVERIF.	TANK	7,500.000	GALLONS
	T01 L	UNVERIF.	TANK	2,160,000.000	GAL./DAY

Inspection of 6/18 & 6/19/91 showed all facility units as certified closed & Division has approved this certification. Site should maintain Interim Status subject to SMU Corrective Action with facility units closed.

Kim A Halpin

DEP 4038 (REV. 12-94)

NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DIVISION OF WASTE MANAGEMENT

GENERATOR INSPECTION REPORT

SITE NAME: American Standard, Inc. EPA ID NUMBER: KYD-006-375-489

TYPE OF SITE: closed

REGISTRATION EXPIRES: 8/31/95 REGISTERED ACTIVITIES:[1] ☐ Small Quantity ☑ Full Quantity

☐ Drum Accumulation ☐ Tank Accumulation ☐ Other Activities

COUNTY: Jefferson DATE: 6/23/95 TIME: 10:15 am ☑ ROUTINE ☐ FOLLOW-UP

I. RECORDKEEPING INSPECTION ITEM	CITE[2]	C[3]	NC	NA	P	R	COMMENTS
1. Operations consistent with registration:	32:010 § 3	✓					
a. All generated wastes on Notification Form	32:010 § 3(4)	✓					
b. Status correctly identified	32:010 § 3(4)	✓					
c. Notification form data correct	32:010 § 3(4)	✓					
d. Up to date registration	32:010 § 3(1)	✓					
2. Hazardous waste determination/analysis record	32:010 § 2	✓					
3. Generator annual report submitted/maintained:	32:040 § 1; 2	✓					received 94
a. Correct information submitted	32:040 § 2(1)	✓					
b. Copy sent to County Judge/Executive	32:040 § 2(3)	✓					
c. Last 3 years on file	32:040 § 1(2)	✓					
4. Inspection requirements:	32:040 § 1(4)	✓					" 94, 95
a. Adequate schedule developed/kept:	35:020 §6(1;2)	✓					
b. Inspection log details:	35:020 § 6(4)	✓					
1) Date of inspection	35:020 § 6(4)	✓					
2) Time of inspection	35:020 § 6(4)	✓					
3) Inspector's name	35:020 § 6(4)	✓					
4) Notation of observations	35:020 § 6(4)	✓					
5) Date & nature of remedial actions	35:020 § 6(4)	✓					
c. Records maintained at least 3 years	35:020 § 6(4)	✓					
d. Inspections conducted and recorded	35:020 § 6(2;4)	✓					
e. Remedial actions taken	35:020 § 6(3)			✓			
5. Personnel training requirements:	32:030 §5(1)(d)	✓					July 8, 1994
a. Adequate training program developed	35:020 § 7(1)	✓					
b. Training conducted by qualified person	35:020 § 7(1)	✓					
c. Appropriate/required employees trained	35:020 § 7(2)	✓					
d. New employees within 6 months	35:020 § 7(2)	✓					
e. Annual retraining	35:020 § 7(3)	✓					
f. Required personnel records:	35:020 § 7(4)	✓					
1) Name and job title	35:020 § 7(4)	✓					

[1] A "Y" means the activity is listed on the Certification of Registration while a "N" means the activity is not listed on the Certification of Registration.

[2] All regulatory cites are from Title 401 of the Kentucky Administrative Regulations. The number preceding the colon is the Chapter reference. The number appearing after the colon is the regulation number. The symbol § is a reference to the section. For example, the reference to "35:020 § 6 should be read as "Section 6 of 401 KAR 35:020" These cites are not comprehensive and other regulatory sections may be applicable.

[3] The abbreviation "C" means compliance with the requirement; "NC" means non-compliance with the requirement; "NA" means the requirement is not applicable at the time of the inspection; "P" means a decision on compliance is pending; and "R" means a violation has been consecutively repeated.

DEP 4038 (REV. 12-94)

GENERATOR INSPECTION REPORT

SITE NAME: American Standard

DATE: 6/23/95

I. RECORDKEEPING INSPECTION ITEM	CITE[2]	C[3]	NC	NA	P	R	COMMENTS
2) Detailed, written job description (duties)	35:020 § 7(4)	✓					
3) Written skill, education & qualifications	35:020 § 7(4)	✓					
4) Training given to & completed by data	35:020 § 7(4)	✓					
g. All training records maintained on-site	35:020 § 7(5)	✓					
6. Contingency Plan & emergency requirements:	32:030 §5(1)(d)	✓					
a. Response actions described as required:	35:040 § 3(1)	✓					
1) 35:040 § 2 - Implementation	35:040 § 3(1)	✓					
2) 35:040 § 7 - Emergency procedures	35:040 § 3(1)	✓					
b. SPCCP, etc. amended for 35:040 provisions	35:040 § 3(2)	✓					
c. Arrangements described	35:040 § 3(3)	✓					
d. Emergency coordinator information	35:040 § 3(4)	✓					
e. List of emergency equipment	35:040 § 3(5)	✓					
f. Copy of contingency plan on-site	35:040 § 4(1)	✓					
g. Distribution of contingency plan	35:040 § 4(2)	✓					
h. Amendment of contingency plan	35:040 § 5	✓					
i. Coordinators' knowledge and authority:	35:040 § 6	✓					
1) Operations, records & waste locations	35:040 § 6	✓					
2) Authority to commit resources	35:040 § 6	✓					
j. Notification of release as required:	35:040 § 7(4)	✓					
1) Local fire & police; state police	35:040 § 7(4)	✓					
2) Local/state/federal ER groups	35:040 § 7(4)	✓					
k. Implementation Report:	35:040 § 2; 7			✓			
1) Time, date & details in report	35:040 § 7						
2) Submitted within 15 days	35:040 § 7						
3) Implementation Reports maintained	35:040 § 7(4)						
7. Arrangements with local authorities:	32:030 §5(1)(d)	✓					
a. Police/fire/hospital/ER teams	35:030 § 7(1;2)	✓					
b. Refusals maintained	35:030 § 7(1;2)			✓			
8. International shipments	32:050 § 1 - 9			✓			
9. Generator manifests:	32:020; 32:100	✓					94, 95
a. Required information	32:100	✓					
b. Manifest properly executed	32:020 § 3; 4	✓					
c. Manifest maintained	32:040 § 1	✓					
d. Exception report submitted & maintained	32:040 § 3; 1			✓			
10. Land disposal restricted wastes:	Chapter 37	✓					94, 95
a. Determination/analysis	37:010 § 7	✓					
b. Dilution prohibited in lieu of treatment	37:010 § 3	✓					
c. Notice/certification with each shipment:	37:010 § 7	✓					
1) All required information	37:010 § 7	✓					
2) Correct treatment standard	37:010 § 7	✓					

DEP 4038 (REV. 12-94)

GENERATOR INSPECTION REPORT

SITE NAME: America Std.

DATE: 6/23/95

I. RECORDKEEPING INSPECTION ITEM	CITE[2]	C[3]	NC	NA	P	R	COMMENTS
3) Waste analysis sent, if available	37:010 § 7	/					
II. PHYSICAL INSPECTION ITEM	**CITE[2]**	**C[3]**	**NC**	**NA**	**P**	**R**	**COMMENTS**
1. Satellite accumulation areas:	32:030 § 5(3)			/			
a. Maximum of 55 gallons	32:030 § 5(3)(a)						
b. 1 quart maximum if acutely hazardous	32:030 § 5(3)(a)						
c. At or near generation point	32:030 § 5(3)(a)						
d. Operator's control	32:030 § 5(3)(a)						
e. Complies with 35:180 § 2; 3; 4(1):	32:030§5(3)(a)1						
1) Condition of containers	35:180 § 2						
2) Compatibility of waste with containers	35:180 § 3						
3) Closed except for adding/removing	35:180 § 4(1)						
f. "Hazardous Waste" marking	32:030§5(3)(a)2						
2. Prevention and preparedness:	32:030 §5(1)(d)	/					
a. Maintained/operated to prevent releases	35:030 § 2	/					
b. Required equipment:	35:030 § 3	/					
1) All Contingency Plan equipment	35:040 § 3(5)	/					
2) Internal communication or alarm system	35:030 § 3(1)	/					
3) Telephone or 2-way radio	35:030 § 3(2)	/					
4) Fire extinguishers, if applicable	35:030 § 3(3)	/					
5) Absorbent material, if applicable	35:030 § 3			/			
c. Required equipment maintained/operated	35:030 § 4						
d. Access to communications or alarm	35:030 § 5						
e. Adequate aisle space maintained	35:030 § 6						
3. Accumulation in containers:	32:030 § 5(1)(a)			/			
a. D.O.T. packaging	32:030 § 1						
b. Accumulation start date:	32:030 §5(1)(b)						
1) Date clearly marked	32:030 §5(1)(b)						
2) Date visible for inspection	32:030 §5(1)(b)						
c. Each clearly marked "Hazardous Waste"	32:030 §5(1)(c)						
d. Condition of containers	35:180 § 2						
e. Compatibility of waste with containers	35:180 § 3						
f. Management of containers:	35:180 § 4						
1) Drums closed (except adding/removing)	35:180 § 4(1)						
2) Operated to prevent leaks or ruptures	35:180 § 4(2)						
g. Container accumulation areas inspected weekly	32:030 § 5 35:180						
1) Check for leaks	35:180						
2) Address container condition	35:180						
h. Ignitable or reactive waste management:	35:180 § 6						
1) 50 feet from property line	35:180 § 6						

DEP 4038 (REV. 12-94)

GENERATOR INSPECTION REPORT

SITE NAME: American Std.

DATE: 6/23/95

II. PHYSICAL INSPECTION ITEM	CITE[2]	C[3]	NC	NA	P	R	COMMENTS
i. Incompatible waste management	35:180 § 7			/			
4. FQG accumulation period of 90 days	32:030 § 5(1)	/					
5. SQG accumulation period of:	32:030 § 6(1)						
a. 180 days or	32:030 § 6(1)						
b. 270 days (if > 200 miles and < 6,000 kg)	32:030 § 6(1)						

III. GENERAL INFORMATION	YES	NO	N/A	COMMENTS
1. Photographs taken?		/	/	
2. Samples collected?			/	
3. Previous non-compliances corrected?			/	
4. Attached Reports:			/	
a. Tanks			/	
b. Hazardous Waste Fuel Marketer			/	
c. Hazardous Waste Fuel Burner			/	

IV. COMMENTS INCLUDING REMEDIAL MEASURES AND EXPECTED CORRECTION DATES

See the attached Facilit Narrative and Compliance Evaluation Inspection Report for further details.

INSPECTOR'S SIGNATURE John Saifer TITLE Env. Inspector II DATE 6/26/95

I hereby acknowledge a copy of this report and further acknowledge that I have been advised of the discrepancies and alleged violations noted during this inspection.

HANDLER'S SIGNATURE _____ TITLE _____ DATE _____

FACILITY NARRATIVE and COMPLIANCE EVALUATION INSPECTION REPORT

1) **Author of Report**
John Scifres, Environmental Inspector III
Kentucky Division of Waste Management
Louisville Regional Office

2) **Facility Location and EPA ID Number**
American Standard, Inc.
1541 South Seventh Street
Louisville, KY 40208
KYD-006-375-489

3) **Facility Mailing Address**
PO Box 1050
Louisville, KY 40201
ATTN: Janace McMonigal

4) **Responsible Official**
Janace McMonigal

5) **Date and Time of Inspection**
June 23, 1995 10:15 a.m. through 12:15 p.m.

6) **Inspection Participants**
John Scifres, DWM
Janace McMonigal, American Standard

7) **Purpose of Inspection**
This inspection was performed to determine American Standard, Inc.'s compliance with 401 KAR Chapters 30, 31, 32, 35 and 37.

8) **Facility Description**
American Standard, Inc. is a former ceramic bath fixture manufacturer that closed in 1992. Current operations involve some minimal storage and demolition of existing buildings. Some of the buildings formerly used by American Standard are now leased to various tenants for warehouses and distribution centers. No manufacturing is currently being conducted at this facility.

American Standard is registered as a full quantity generator of hazardous waste. Wastestreams include material solely from demolition. The site had one hazardous waste treatment unit that was certified as closed in 1988 by the Hazardous Waste Branch. The company does not anticipate generating any more hazardous waste but will maintain their registration until all demolition is completed.

The site consists of five clusters of buildings. Some of the buildings are used to store various inventory and equipment. When hazardous waste is generated, it is accumulated in building #58. No other accumulation or satellite accumulation areas for hazardous waste are present anywhere else on the site.

9) Findings

This inspection began with a physical inspection of all buildings which are not leased to tenants. No hazardous waste was being accumulated at the time of this inspection. Most of the buildings are empty with the exception of building #109 which is being used to store the company's products. Some equipment is stored in building #15. This concluded the physical portion of the inspection.

A records review was conducted after the walkthrough. This included registration, waste determinations, the 1994 Annual Report, handler self inspections, personnel training, contingency plan, arrangements with local authorities, manifests, and land disposal restricted waste notices.

The company is properly registered as a full quantity generator of hazardous waste.

The company uses its knowledge of wastestreams for waste determinations in most cases. Where demolition involves areas where hazardous materials are known to have been handled, the demolition debris is managed as hazardous waste. In cases where hazardous materials were never handled (eg. offices) the demolition debris is handled as non-hazardous waste. In cases where demolition involves areas that are suspect, sampling is conducted to determine whether hazardous materials are present and the debris is handled accordingly.

The 1994 Annual Report was submitted and mailed to the required County Judge/Executives. The amounts reported were verified as correct by comparing them to the amounts from manifests.

Inspection logs, personnel training, manifest and land disposal restricted waste notices from 1994 and 1995 were reviewed and found to be in compliance. The contingency plan and arrangements with local authorities were also found to be in compliance.

10) Violations and Remedial Measures

No violations of waste management requirements were identified as a result of this inspection.

11) Signatures and Date of Report

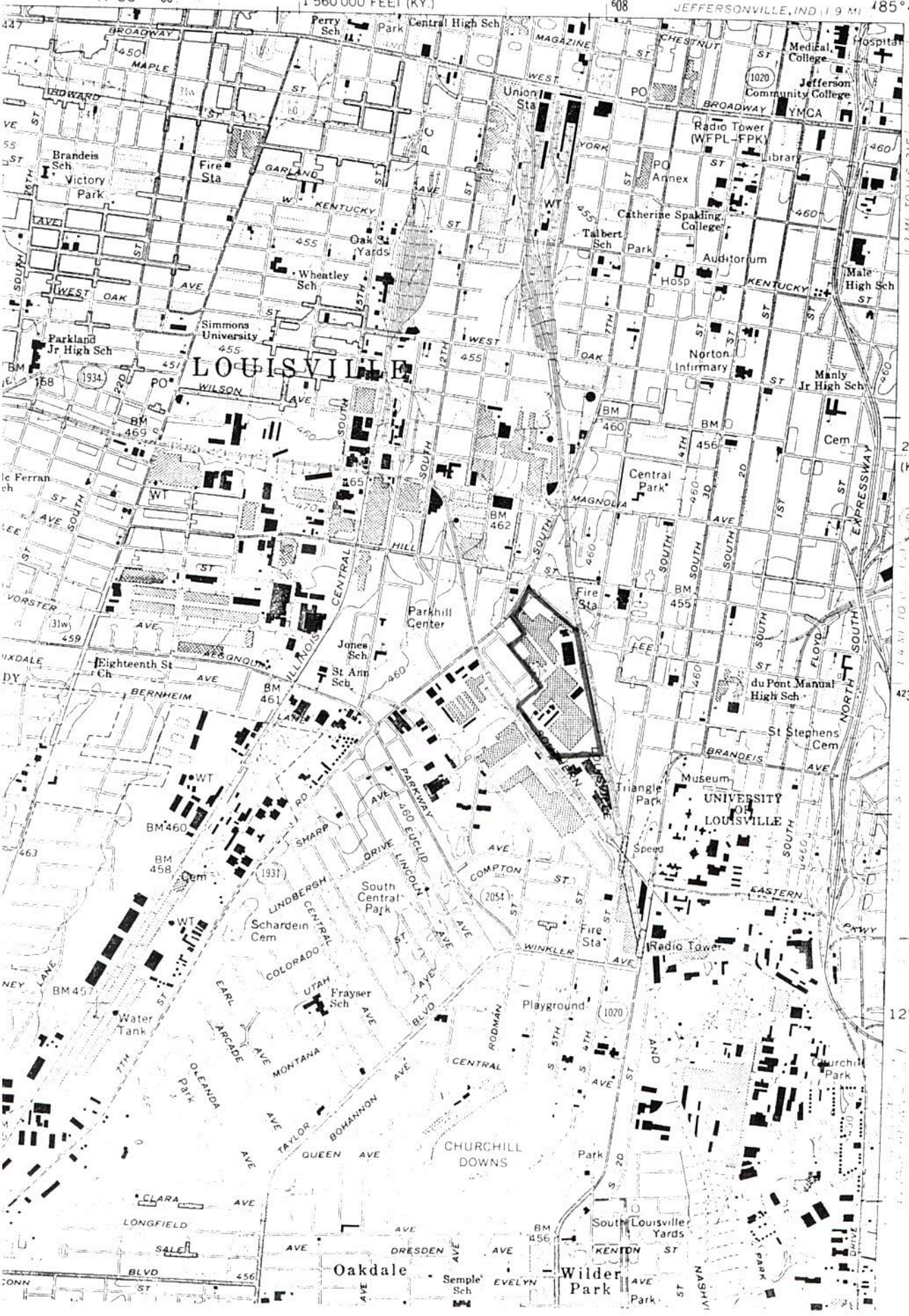
John Scifres, Environmental Inspector III
Kentucky Division of Waste Management
Louisville Regional Office

6/26/95
Date

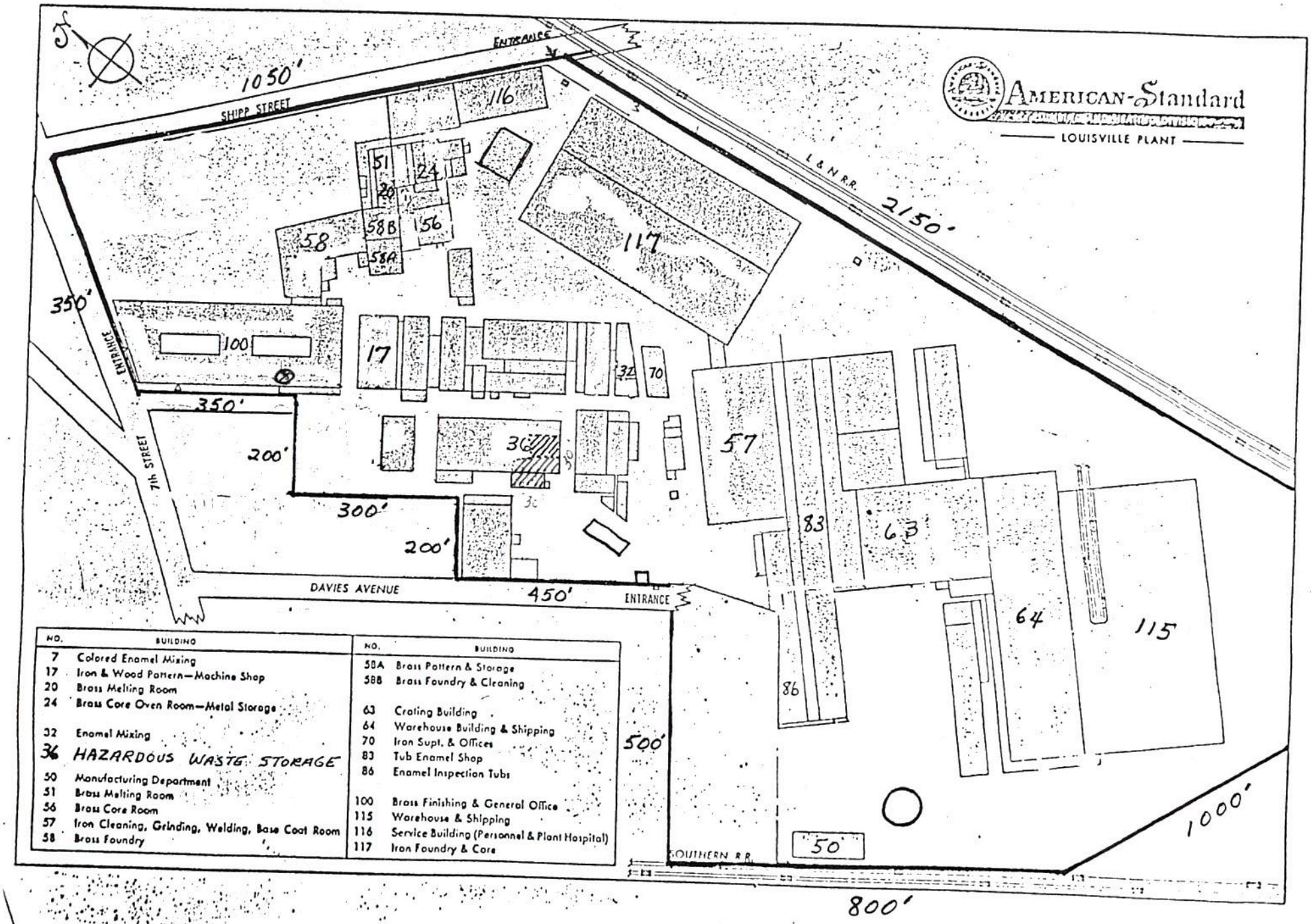
Lesley Henney, Env. Control Supervisor
Kentucky Division of Waste Management
Louisville Regional Office

6/26/95
Date

LOUISVILLE WEST QUADRANGLE
KENTUCKY–INDIANA
7.5 MINUTE SERIES (TOPOGRAPHIC)
NE/4 KOSMOSDALE 15' QUADRANGLE



DRUM STORAGE 30' x 30'



NO.	BUILDING
7	Colored Enamel Mixing
17	Iron & Wood Pattern—Machine Shop
20	Brass Melting Room
24	Brass Core Oven Room—Metal Storage
32	Enamel Mixing
36	HAZARDOUS WASTE STORAGE
50	Manufacturing Department
51	Brass Melting Room
56	Brass Core Room
57	Iron Cleaning, Grinding, Welding, Base Coat Room
58	Brass Foundry

NO.	BUILDING
58A	Brass Pattern & Storage
58B	Brass Foundry & Cleaning
63	Crating Building
64	Warehouse Building & Shipping
70	Iron Supt. & Offices
83	Tub Enamel Shop
86	Enamel Inspection Tubs
100	Brass Finishing & General Office
115	Warehouse & Shipping
116	Service Building (Personnel & Plant Hospital)
117	Iron Foundry & Core

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4WD-SISB

DATE: 3/7/90

Mr. Murray Warner
NUS Corporation
1927 Lakeside Parkway
Tucker, Georgia 30084

Dear Mr. Warner:

This letter concerns the proposed/completed FIT report on the following CERCLA site:

Site Name: American Standard

Site I.D.#: KYD006375489

Site Reference#: _____

EPA Project Manager: Benedikt

The above site has been assessed by EPA and a disposition made on it. Therefore, it has now been assigned to FIT for the following action:

_____ NFRAP

_____ PA

_____ SSI Phase I (PAR)

_____ SSI Phase II

_____ LSI Evaluation

_____ LSI

_____ ✓ Other case EPI

Acknowledging receipt of assignment

[signature] Date 03/13/90

RECEIVED

MAR 15 1990

NUS CORPORATION
REGION IV
SENT TO_____

Sincerely,

Susan M. Deihl, Chief
North Unit
Site Assessment Section

U. S. Plumbing Products
P.O. Box 1050
Louisville, Kentucky 40201
Tel. (502) 637-7621

AMERICAN STANDARD

of **American Standard Inc.**

March 12, 1982

Ecology and Environment, Inc.
4319 Covington Highway
Decatur, Georgia 33035

Attention: Ms. Carol Thurmond

Dear Ms. Thurmond:

In response to your request, I am enclosing copies of a detailed waste characterization profile and various toxicity test results. It is to be noted that all of the data confirms and indicates little or no propensity for contaminants to leach from the composite sample analyzed.

Historically, the source of plant waste has been from three types of manufacturing operations; namely, cast iron and brass foundries and enameling. Of this total waste, 95% results from cast iron operations with less than 2% of its component exhibiting hazardous characteristics. Approximately 40,000 tons per year of the waste mixture have been generated in the following proportions:

	TOTAL WASTE	HAZARDOUS COMPONENTS	
OPERATION	Tons / Year	Tons / Year	% Total
Cast Iron Foundry	39,270	525	1.2%
Brass Foundry	2,006	655	1.5%
Enameling	125	125	0.3
TOTAL	41,401	650	3.0%

TABLE 1
WASTE IDENTIFICATION/HANDLING
AMERICAN STANDARD LOUISVILLE, KENTUCKY

RMT WASTE ID #	WASTE TYPE	WEIGHT OR VOLUME[1] NEED	WEIGHT OR VOLUME[1] ESTIMATE	SAMPLE COLLECTED BY RMT	SAMPLE COLLECTED BY AM. STD	TESTING PROGRAM[2,3] ACID EP	H_2O EP	H_2O AFS	OTHER	REASON FOR TESTING	HANDLING	PROBABLE/LIKELY CLASSIFICATION[4] HAZ.	PROBABLE/LIKELY CLASSIFICATION[4] NON-HAZ.	COMMENTS	EPA #
1339	BRASS FOUNDRY - Dielectric Core	X	1440		X	•				NONE: No EP Toxic constituents in raw materials. RMT experience in testing each as crosscheck indicates nonhazardous	Foundry Waste Pile		X		
1340	- Isocure Core	X	720		X	• Composite					Foundry Waste Pile		X	6/9/81 composite testing showed non-hazardous	
1341	- Hot Box Core	X	165		X	•					Foundry Waste Pile		X		
1342	- Core Room Floor Sweepings	X	In (1339-1341)		X						Foundry Waste Pile		X		
1364	- Furnace/Ladle Linings	X (Est)	72		X If poss.					None: Seldom Generated. However, could be hazardous	To be Determined When Generated			If necessary, handle as hazardous when generated	
-	- Beghouse Dust Furnace	NA	NA	NA	NA	•				NA* Waste is and always has been Sold		X(E)		2/5/81 testing 104.5 mg/l cadmium 498.5 mg/l lead	0006 0008
1343	- Beghouse Dust Shotblast Pang.	X	110		X	• Composite				NA Lab tests available. No retest needed.	Foundry waste Pile pre 11/80 handled as H.W. post 11/81 Hopper.	X(E)		10/24/80 testing showed hazardous 303 mg/l lead	0008
1344	- Beghouse Dust Shotblast Wheel	X	110		X	•						X(E)			
1138	- Shot Separating Waste Pang.	X	1920	Collected 6/17/81						Testing should be done to determine whether or not to handle in foundry waste pile	Foundry Waste Pile pre 11/80	(E)		Likely has to be handled as hazardous	0008
1139	- Shot Separating Waste Wheel.	X	1920	Collected 6/17/81							Barrelled as H.W. post 11/80	(E)			0008
1141	- Rotoclone Sludge Dust Collector	X	1403	Collected 6/17/81		•				NA Assume lab tests are correct - no retest needed	Foundry Waste Pile pre 11/80 Barrelled as H.W. post 11/80	X(E)		Testing 10/24/80 showed hazardous 12.54 mg/l lead.	0008
1140	- System or Excess System Sand	X	7488	Collected 6/17/81		•				Testing should be done to assure classification (Large Volume)	Foundry Waste Pile		X	6/9/81 testing showed non-hazardous.	
1345	- Core and Mold Lumps (Screen)	X	In (1346)		X(1 wk c)					NA Likely non-hazardous based on core and mold waste testing	Foundry Waste Pile		X		

1 Estimate lbs/day.
2 • = Waste testing performed.
3 GS = Grain Size; AL = Atterberg Limits, Perm. = Permeability, Den. = Density
4 (E) = EP Toxic

TABLE 1 (Cont'd)
WASTE IDENTIFICATION/HANDLING
AMERICAN STANDARD LOUISVILLE, KENTUCKY

FMT WASTE ID #	WASTE TYPE	WEIGHT OR VOLUME[1] NEED	WEIGHT OR VOLUME[1] ESTIMATE	SAMPLE COLLECTED BY FMT	SAMPLE COLLECTED BY AM. STD	TESTING PROGRAM[2,3] ACID EP	H_2O_2 EP	H_2O_2 AFS	TESTING PROGRAM[2,3] OTHER	REASON FOR TESTING	HANDLING	PROBABLE/LIKELY CLASSIFICATION HAZ.[4]	PROBABLE/LIKELY CLASSIFICATION NON-HAZ.[4]	COMMENTS	EPA #
	- Rotoclone sludge 2.0 Collector(s)	C O			C O	•				NA Lab tests available - Am Standard should check to see how composite was made. If it cannot be reconstructed then retesting may be needed.	Foundry Waste Pile		X		
	- Rotoclone Sludge 2.1 Collector(H)	H P O S			H P O S	•					Foundry Waste Pile		X		
1350	- Rotoclone Sludge 2.2A Collector (H & T & T)	I T E	7200		I T E	• Composite					Foundry Waste Pile		X	10/24/80 Composite 20-2,5 A according to Am Standard testing showed nonhazardous	
		S			S										
	- Rotoclone Sludge 2.4 Collector (H)	A M			A M	•					Foundry Waste Pile		X		
	- Rotoclone Sludge 24A Collector (H)	P L			P L	•					Foundry Waste Pile		X		
	- Rotoclone Sludge 2.5A Collector(T,T)	E			E	•					Foundry Waste Pile		X		
1351	- Beghouse Dust 2.6 Collector	X	214		X					NA FMT experience indicates no need to test	Foundry Waste Pile		X		
-	- Beghouse Dust 2.7 Collector	X	No Longer Exists		X						Foundry Waste Pile		X		
-	- Rotoclone Sludge 2.8 Collector	X	In (1350)		X						Foundry Waste Pile		X		
-	- Core and Mold Lumps (Screen)	X	In (1353)		X					NA Testing not needed based on core/mold testing	Foundry Waste Pile		X		
1136	- System or Excess System Sand	X	160,000	Collected 6/17/81		•		•	GS AL DEN PERM	Retesting needed to determine reuse potential, mixing, declassification.	Foundry Waste Pile		X	6/9/81 Testing showed non-hazardous.	
1353	- Foundry Floor Sweepings	X	2,000		X (lwk c)					NA FMT experience indicates no need to test	Foundry Waste Pile		X		

1 Estimate lbs/day.
2 • = Waste testing performed.
3 GS = Grain Size; AL = Atterberg Limits, Perm. = Permeability, Den. = Density
4 (E) = EP Toxic

TABLE 1 (Cont'd)
WASTE IDENTIFICATION/HANDLING
AMERICAN STANDARD LOUISVILLE, KENTUCKY

RMT WASTE ID #	WASTE TYPE	WEIGHT OR VOLUME[1] NEED	WEIGHT OR VOLUME[1] ESTIMATE	SAMPLE COLLECTED BY RMT	SAMPLE COLLECTED BY AM. STD	TESTING PROGRAM[2,3] ACID EP	H_2O EP	H_2O AFS	OTHER	REASON FOR TESTING	HANDLING	PROBABLE/LIKELY CLASSIFICATION HAZ.[4]	PROBABLE/LIKELY CLASSIFICATION NON-HAZ.	COMMENTS	EPA #
1361	- Sand Blast Booth 5.0 and 5.1 Non-Skid Baghouse Dust	X	1350		X	•				Testing done as sand blasting of enamel means waste has enamel in it	Foundry Waste Pile		X	7/20/81 testing showed nonhazardous.	
-	- Enamel Dust Overshake (Pit)	NA	NA	NA	NA					NA ---------	Reclaimed to Enamel Mix	x(E)			D008
1142A	- Enamel Dust Floor Sweepings	X	1130	NA	Composite of enamel mix wastes 1142, 1143, 1144					NA Hazardous based on testing of enamel mix wastes	Foundry Waste Pile pre 11/80 Barrelled as H.W. post 11/80	X(E)		Handle as high lead	D008
-	- Oven Brick Linings	X	None Limited		X if poss.					NA Seldom generated. However could be hazardous.	To Be Determined When Generated		T	If necessary handle as hazardous when generated	
	ENAMEL MIX BUILDING														
1146	- Enamel Blend Room Baghouse	X	500	Collected 6/17/81		•				NA Lab tests are available: no retesting is needed. RMT will develop overall composite and test as composite.	Foundry Waste Pile pre 11/80 Barrelled as H.W. post 11/80	X(E)			
1145	- Enamel 3rd Floor Baghouse Loading	X	50	Collected 6/17/81		•								Testing 10/24/80 showed hazardous 87 mg/l lead.	
1142 1144 1143	- Enamel Recycle Floor Sweepings - White - Light - Dark	X	200 100 100	Collected 6/17/81		• Composite								Composite 10/24/80 testing showed hazardous 283 mg/l lead	D008
1147	- Enamel Glass Spills 1st Floor		50			•									
1142 -1147	- Enamel Spills with grease 1st		In 1142-1147			•									
-	- Smelt Furance Linings		-		X if poss.					NA Rather than test handle as haz. (Low Vol.)	Foundry Waste Pile	X(E)		Handle as high lead	D008
-	Empty Lead Containers	NA	NA	NA	NA					No testing required - Non-hazardous if triple rinsed				Check on disposal	

1 Estimate lbs/day.
2 • = Waste testing performed.
3 GS = Grain Size; AL = Atterberg Limits, Perm. = Permeability, Den. = Density
4 (E) = EP Toxic

TABLE II

SUMMARY OF EP LEACHING TEST RESULTS
BRASS FOUNDRY

Parameter[1] (Hazardous Waste Limit)	Brass Core[3] Sand Composite	Brass[5,6] Baghouse Furnace Dust	Brass Baghouse Dust[5] Wheelabrator and Pangborn	Brass Spo[5] Rotoclone Sludge	Brass Mold[3] Sand (excess system sand)	Brass[4] Foundry Floor Sweepings (1346)
Arsenic (5.0)	0.1218	[2]<1.0	1.5	1.8	0.0896	0.002
Barium (100.0)	0.327	<1.0	<1	15	0.480	0.2
Cadmium (1.0)	<0.001	104.5	0.19	0.59	0.041	0.08
Chromuim (5.0)	<0.01	< 0.05	0.51	0.17	< 0.01	0.25
Lead (5.0)	<0.003	498.5	303	12.54	0.019	1.7
Mercury (0.2)	0.0006	<0.01	<0.02	<0.02	0.0011	0.0002
Selenium (1.0)	0.1696	0.88	<0.05	<0.05	0.1593	<0.001
Silver (5.0)	<0.002	<0.01	0.19	<0.05	0.002	<0.02
pH (Final)	--	--	--	--	--	5.2
Date	6/9/81	2/5/81	10/24/80	10/24/80	6/9/81	7/20/81

[1] All values in mg/l.

[2] < means that parameter was not detected at or above that concentration.

[3] Tests performed by Environmental Consultants, Inc.

[4] RMT test results on samples from 6/81 and 7/81 sampling, performed by RMT, Inc. Laboratory

[5] Tests performed by Chemical Service Laboratory, Inc.

[6] This material reclaimed.

5035-1000/D191

TABLE III (Cont'd)

SUMMARY OF EP LEACHING TEST RESULTS
IRON FOUNDRY

Parameter[1] (Hazardous Waste Limit)	Iron[5] Foundry Rotoclone Sludge Composites	Iron -[5] Baghouse Cleaning House 3.5	Iron[5] Rotoclones Cleaning House	Iron[4] Cleaning Room Baghouse Dust (3.7) #1357	Iron[4] Cleaning Room Baghouse Dust (5.0 & 5.1) #1361	
Arsenic (5.0)	<0.05	0.08	<0.05	0.001	0.002	
Barium (100.0)	<1	2	10	<0.2	<0.2	
Cadmium (1.0)	0.07	<0.05	<0.05	0.12	<0.01	
Chromium (5.0)	0.13	0.05	0.05	<0.05	<0.05	
Lead (5.0)	<0.05	<0.05	0.19	<0.1	<0.1	
Mercury (0.2)	<0.02	<0.02	<0.02	<0.0002	<0.0002	
Selenium (1.0)	<0.05	<0.05	<0.05	<0.001	<0.001	
Silver (5.0)	<0.05	<0.05	<0.05	<0.02	<0.02	
pH	-	-	-	5.1	5.1	
Date	10/24/80	10/24/80	10/24/80	7/20/81	7/20/81	

[1] All values in mg/l.

[2] < means that parameter was not detected at or above that concentration.

[3] Tests performed by Environmental Consultants, Inc.

[4] RMT test results on samples from 6/81 and 7/81 sampling, performed by RMT, Inc. Laboratory

[5] Tests performed by Chemical Service Laboratory, Inc.

TABLE V

SELECTED COMPOSITE SAMPLE
EP LEACHING TEST RESULTS

PARAMETER[1] (HAZARDOUS WASTE LIMIT)	BRASS[3] FOUNDRY COMPOSITE 1432	IRON[4] FOUNDRY COMPOSITE 1433	ENAMEL MIX[5] BUILDING COMPOSITE 1431	IRON FOUNDRY[6] ENAMEL MIX BUILDING COMPOSITE 1435	COMPOSITE OF[7] BRASS, IRON, AND ENAMEL 1434	COMPOSITE OF[8] BRASS, IRON, AND ENAMEL 1434
Arsenic (5.0)	<0.001	0.002	0.022	0.002	0.003	0.001
Barium (100.0)	0.3	1.3	0.9	1.3	1.4	<0.02
Cadmium (1.0)	0.07	<0.01	0.03	<0.01	0.02	<0.01
Chromium (5.0)	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Lead (5.0)	3.5	<0.1	550	<0.01	0.3	<0.1
Mercury (0.2)	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
Selenium (1.0)	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
Silver (5.0)	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
pH (Final)	5.0	5.1	5.2	5.1	5.0	9.4
Date	11/19/81	11/19/81	11/19/81	11/19/81	11/19/81	11/19/81

1 All values in mg/l.
2 < means that parameter was not detected at or above that concentration.
3 Brass composite does not include furnace dust, furnace slag, which have always been sold.
4 Iron composite includes all wastes from iron and iron cleaning room.
5 Enamel mix building includes all wastes generated in mix room (floor sweepings, spills, dust, etc.)
6 Proportional mix by waste volume generated.
7 Includes proportional weights of all wastes from iron and brass foundry, enamel mix building and buffing dust.
8 Same as 7 but leached with water (Note pH).

NOTE: All tests performed by RMT, Inc. Laboratory

5035-1000/0191

posal practices. Therefore, we respectfully withdraw the two CERCLA forms submitted June 4, 1981 by the plant.

We would appreciate receiving your acknowledgement and concurrence in this matter, so that we can close the matter promptly. Should you desire further information, do not hesitate to contact my office at (212) 840-5426.

In addition, all the data set forth in the enclosed report is submitted under a claim of business confidentiality because its disclosure, in whole or in part, in such way as to reveal its source may reasonably be expected to have an adverse competitive impact. In this connection, it is hereby requested that I be immediately informed in the event that you should receive any request for disclosure of any of the data or its source.

Very truly yours,

Lenore H. Schupak

Lenore H. Schupak
Manager
Environmental Technology

LHS:rk
Enclosure

cc: Mr. Leo Huelsman ✓
American-Standard
Louisville Plant

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APPENDICES

2. FINDINGS AND CONCLUSIONS

1. Since the plant opened in 1900, American Standard used only two sites in the Louisville area for the disposal of its waste.

2. From 1900 to about 1960, American Standard's wastes were deposited at the Kessler sandpit in Louisville, Kentucky. Figure 1 indicates the location of this facility with regard to the American Standard plant. Section 4 of this report contains a detailed description of the Kessler sand pit with regard to its physical location and environmental setting. Specifically, the site is located in a highly permeable sand and gravel area where ground water moves quickly (approximately 100 feet per year). Due to the heavy use of the sand and gravel aquifer in this area for water supply and the large volume of foundry waste that was probably used to fill the pit, detectable concentrations of some contaminants may be found beyond the property line. However, because this sand and gravel is extremely permeable, and a large volume of ground water is available for dilution, it is likely that if any contamination from American Standard's waste was present, it would have been greatly diluted. Also, the use of the pit by waste generators other than American Standard may have affected the concentrations of leachate reaching the groundwater. However, since composite samples of the waste tested using the EP water leaching test indicated nondetectable levels of contaminants, it is unlikely that there is any environmental problem at this site caused by American Standard's wastes.

3. Since 1960, American Standard has used several sites in the Knopp Avenue area, including the K and B Body Shop--Blue Grass Pallet Company facility. Before November 1980, all of the wastes identified in this report were deposited at this facility; since that time only those identified as nonhazardous continue to be deposited at this site in various locations. The area used for the deposition of foundry waste appears to be 4,000 feet wide and approximately 1,400 feet long (approximately 130 acres). At the time of RMT's inspection, only a small area was being used for disposal. Foundry waste in the Knopp Avenue area has been deposited in shallow lifts over relatively impermeable soils (10^{-5} cm/sec to 10^{-7} cm/sec), mostly clays and silts. A map and a more detailed description of the environmental setting and location is presented in Section 3 of this report.

   Movement of heavy metals in this environment would be unlikely because of the relatively slow movement of ground water within these soils, the alkaline nature of the soils, and the alkalinity of the waste composite under water leaching conditions. Further, any potential for contamination from this facility would also be unlikely. Leaching test results and a limited investigation of the site support this conclusion. Hence, further investigation or monitoring of the Knopp site does not appear warranted at this time. Furthermore, the Knopp

3. KNOPP SITE

3.1 Introduction

This site, shown on Figure 1, is located southeast of Louisville, near the intersection of Outer Loop Drive (Highway 1065) and the Kentucky Turnpike (Highway 65). This area, known as Knopp, has been developed as a residential and small commercial neighborhood. The Knopp area is about 4000 feet wide (east-west) and about 1,400 feet long (north-south), which amounts to approximately 130 acres. American Standard's wastes have been deposited, in part, in this area for about 20 years. Only selected areas where property owners have wanted fill material to raise the grade have been filled. Two large fill areas include the K and B Body Shop on Melton Avenue and the Blue Grass Pallet Company on Knopp Avenue. At the time of our site inspection on June 16, 1981, a small one acre ± parcel about 200 feet north of Knopp Avenue on the eastern end of Knopp was being filled. American Standard personnel also pointed out several small areas on Knopp and Melton Avenue and Grade Lane where foundry waste had been deposited. These disposal sites are generally small (less than several acres) and quite shallow, generally less than 5 feet.

3.2 Environmental Setting

The Knopp site is located in an area of lacustrine soils (soils deposited in a shallow lake environment). The soils are principally silts and clays classified as CL and CH on the Unified Soil Classification System. Therefore, at least 50 percent of the material (by weight) is silt-sized or smaller. Because the soils were developed in a glacial lake environment, they are layered (varved). This layering

results in a difference of permeability (ability of a soil to transmit ground water) when the soil is measured horizontally and vertically. The soil survey for Jefferson County indicates that the horizontal permeability is approximately 10^{-5} cm/sec (10 ft/yr) and the vertical permeability is 10^{-7} cm/sec (0.1 ft/yr). The exact thickness of these soils is not known, but from data on soils near this area, we estimate that the soils are approximately 20 feet thick. For example, a well at the far west end of the Knopp subdivision is 30 feet deep and is constructed in the underlying bedrock. These soils have a pH ranging from neutral to basic. The deeper soils in this area are more basic, with a pH of about 8.0.

These soils are underlain by a shale bedrock formation (New Albany shale) at least 90 feet thick (Geologic Map, Louisville East, 1974). This rock formation is considered an aquitard, that is, it generally does not supply suitable quantities of ground water to even small capacity wells.

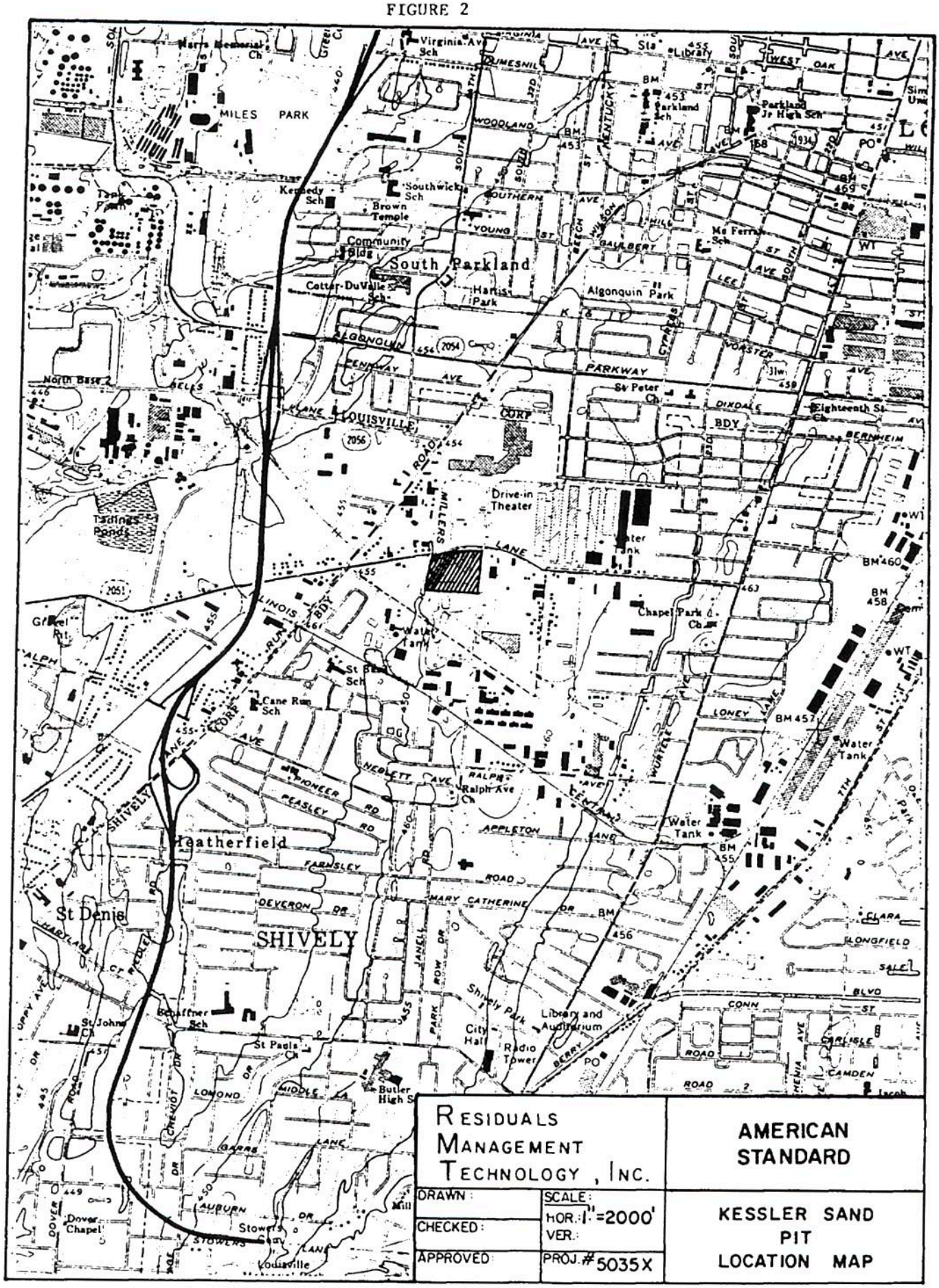
Ground water within Knopp is found within the clay soils and no more than one foot below ground surface. This poor drainage is due to the composition of the clay soils and the low permeability of the New Albany shale (below the fractured zone). Ground water flow patterns in this area have not been defined; however, the drainage features shown on the USGS map suggest probable ground water flow directions. Water within drainage ditches constructed along Knopp and Melton Avenues reflect the ground water table; thus, ground water from areas adjacent to the ditches is being discharged to these ditches. Farther away from the road ditches, Slop Ditch to the south and Northern Ditch to the north control ground water flow directions. Because of the shallow

area of soil is much lower than what occurs in most landfill situations, and it is not likely that the soil's attenuative capacity will be entirely used.

3.4 Recommendations

On the basis of the hydrogeologic environment and the method of waste disposal, it is unlikely that Amercian Standards' waste has adversely affected a useable ground water supply. Also, because of soils underlying the site, surface water within the ditch system has probably not been affected by the waste. Therefore, we recommend that American Standard not proceed with further ground water investigation at this site.

FIGURE 2



RESIDUALS MANAGEMENT TECHNOLOGY, INC.		AMERICAN STANDARD
DRAWN:	SCALE: HOR. 1" =2000' VER.	KESSLER SAND PIT LOCATION MAP
CHECKED:		
APPROVED:	PROJ.# 5035X	

4.3 Conclusions

a. The soils below the former sand pit make it likely that any leachate from American Standard's waste could reach the water table, which is in a major aquifer; however, because of the low leaching potential (under water leaching conditions) of the waste, significant contamination is not probable.

   1. The soils have a high permeability, both horizontally and vertically, of about 10^{-2} cm/sec; thus, ground water moves quickly, about 100 ft/yr, and in large quantities.

   2. The soils do not have a high silt and clay content; thus, their capacity to remove heavy metals from solution is not large.

b. Because the sand and gravel aquifer is very permeable, large quantities of ground water move under the site; therefore, any leachate that may reach the water table is highly diluted. This makes it unlikely that leachate contaminated ground water is in measureable concentrations (above background concentrations) far from the site.

c. It is unlikely that the limestone bedrock has been affected because the water table remains above the bedrock surface (even in the heavy use areas).

d. The large depth of foundry fill (perhaps 1/2 of the assumed 75 feet of total fill), as well as other fill material, concentrates pollutants within the fill material over a relatively small base area (20± acres). This situation (as opposed to the shallow fill at the Knopp Site) can lead to higher concentrations of some pollutants in any leachate that is generated.

e. The topography of the pit (at least to 1971) allowed for surface water drainage to enter the pit from all sides, adding to the water infiltrating the waste.

4.4 Recommendations

On the basis of the hydrogeologic environment and the nature of the pit, any leachate generated from the wastes may have reached the ground water table and migrated away from the site. To confirm this, ground water monitoring could be done. In addition, discussions with the Kesslers to determine the size of the pit, its exact location and who else may have used it, and discussions with other waste generators to

REFERENCES

1. United States Geological Survey, Water Supply Paper 1579, 1963.
2. _____, Water Supply Paper 1411, 1957.
3. _____, Water Suppy Paper 1360-B, 1956.
4. _____, Water Supply Paper 1819-C, 1966.
5. _____, Water Supply Paper 1818, 1966.
6. _____, Hydrogeologic Investigation Atlas HA-130, 1964.
7. _____, Geologic Map of Parts of the Louisville West and Janesville Quadrangles, Jefferson County, Kentucky, 1974.
8. _____, Geologic Map of the Louisville East Quadrangles, Jefferson County, Kentucky, 1974.
9. _____, Hydrologic Investigations Atlas HA-8, 1956.
10. United States Department of Agriculture, Soil Conservation Service, Soil Survey Jefferson County, Kentucky, 1966.
11. Kentucky Geological Survey, Series X, Information Circular 6, 1961.
12. _____, Series X, Information Circular 10, 1962.

5035X-1810
Comes file

CERTIFIED MAIL

June 4, 1981

U.S. EPA Region 4
Sites Notification
Atlanta, Georgia 30308

Attn: Mr. Wayne Mathis

Re: Comprehensive Environmental Response, Compensation and Liability Act
EPA Form 8900-1,
Notification of Hazardous Waste Site

Dear Mr. Mathis:

We refer to the above captioned form with respect to our American-Standard plant in Louisville, Kentucky.

The plant's foundry and related manufacturing operations routinely generated excess sand, flyash and enamel powder, the total of which had been reused as a fill material. Although we believe this material to be non-hazardous based on the results of EP toxicity testing, we believe a small percentage of this material contained components which exhibit hazardous characteristics. We are proceeding with further testing to resolve this matter; however, in the meantime Form 8900-1 is being submitted as a precautionary measure. Please note that the entries made on these forms may include data based on estimates or approximations. Entries have not been made where data requested is not applicable or is unknown.

Very truly yours,

Lenore H. Schupak

Lenore H. Schupak
Manager
Environmental Technology

LHS:rk

cc: Charles Gordon

Information

The primary purpose of this notification program is to locate hazardous waste sites which treated, stored, or disposed of hazardous waste in the past and at which hazardous waste is still present. The most important information you can provide to EPA is the existence of a hazardous waste site and its location. For purposes of describing the hazardous waste to be found at a site, the quantities of such waste and the type of activity at a site EPA is not requiring that you painstakingly document the information submitted. This information may be based on your knowledge, belief, recollection or reasonably available records.

Who Must Notify

Section 103(c) of Superfund requires that, unless exempted, the following must notify EPA:

- Any person who presently owns or operates a site where there are facilities that store, treat, or dispose of hazardous wastes.
- Any person who, at the time of disposal, owned or operated a site where there are facilities that store, treat, or dispose of hazardous wastes.
- Any person who accepted hazardous wastes for transport and selected a site where there are facilities that store, treat, or dispose of hazardous wastes.

Persons required to notify include individuals and private [illegible] and government [illegible]

[illegible]

1. Section 3010 of the Resource Conservation and Recovery Act (RCRA) requires any person who generates or transports hazardous wastes or who owns or operates a facility that treats, stores, or disposes of hazardous wastes to notify EPA of such activities. For purposes of this notification any person who notified under Section 3010 for one or more treatment, storage, or disposal facilities does not have to notify EPA again of those specific facilities. However, notification is required for facilities not previously reported under Section 3010 that are on or contiguous to sites reported under Section 3010.

2. A person does not have to notify of facilities that have qualified for Interim Status under RCRA.

3. Facilities at which less than 55 gallons (or 7.4 cubic feet) of hazardous wastes have been disposed are not subject to this notification requirement.

4. Locations where hazardous waste accumulated only as a result of minor leakage or spillage that occurred in the course of normal operations are not considered hazardous waste sites for purposes of this notification unless such accumulation may pose significant risk to human health and the environment.

5. Municipal landfills, town dumps and other facilities that receive household wastes only, are not subject to notification. Municipal landfills that received hazardous wastes, especially wastes in segregated shipments from industrial services, would be expected to notify.

6. Facilities at which hazardous wastes had been treated or stored and from which all those hazardous wastes have been removed so as to eliminate any risk to human health and the environment are not subject to this notification requirement.

7. [illegible] of the Federal Insecticide, Fungicide, and Rodenticide Act and the [illegible]

[illegible] notification requirement. Sites at which pesticides have been disposed are subject to the notification requirement of Section 103(c). Farmers who have disposed of waste pesticide in a manner consistent with the disposal instruction on the pesticide label are not subject to this notification requirement.

8. Stoppage in transport of hazardous waste which is temporary, incidental to the transportation, or at the ordinary operating convenience of a common or contract carrier is not, for purposes of this notification, storage.

9. Certain facilities which handle hazardous wastes pursuant to RCRA are not subject to this notification requirement. They include:

- Product or raw material storage tanks and transportation vessels or vehicles which are presently in use are not considered hazardous waste storage facilities, even though hazardous waste may be generated in such units in the course of their use. This does not extend, however, to units which are no longer in use and in which hazardous waste remain.
- Short-term accumulation (90 days or less) of hazardous wastes by generators subject to RCRA regulations is not, for purposes of this notification, storage.
- Totally enclosed treatment facilities.
- Wastewater treatment tanks and neutralization tanks.

[illegible]

[illegible] listed or identified as hazardous in the regulations issued under Section 3001 of RCRA. You are not expected to sample wastes to determine if they are hazardous. Rather, you can use any knowledge you have of the wastes, including the materials or processes involved or the types of facilities that generate the wastes. You should notify about sites if you believe the wastes may be hazardous due to barrel labels, odors, health effects, or other indicators.

Polychlorinated biphenyls (PCBs) are not currently included within the RCRA Section 3001 regulations but are regulated under the Toxic Substances Control Act (TSCA). Consequently, notification of PCB treatment, storage, or disposal sites is not mandatory. However, in order to make this notification more comprehensive, EPA is requesting a voluntary notification of sites containing PCBs as part of this notification program.

Wastes Not Subject To Notification

The following wastes are not subject to notification under Section 103(c) of Superfund:

1. Solid wastes listed below not presently regulated as "hazardous waste" under RCRA:

- "Household waste", defined as any waste material (including garbage, trash, and sanitary wastes in septic tanks) derived from households (including single and multiple residences, hotels, and motels).
- Solid wastes generated by any of the following and returned to the soil as fertilizers:

—The growing and harvesting of agricultural crops

—The raising of animals including animal manure

- Mining overburden returned to the mine site.

Act (the "Comprehensive Environmental Response Compensation and Liability Act of 1980" (Superfund).

Administrator: the Administrator of the United States Environmental Protection Agency.

Disposal: the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

Environment: (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Fishery Conservation and Management Act of 1976, and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.

[illegible] including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous waste has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel. (For purposes of this notification, (A) is most applicable.)

Hazardous Waste: for purposes of this notification requirement means any hazardous waste having the characteristics identified under or listed pursuant to section 3001 of RCRA (but not including any waste the regulation of which under RCRA has been suspended by Act of Congress).

Owner or Operator: (A) in the case of an onshore facility, any person owning or operating such facility, and (B) in the case of any abandoned facility, any person who owned, operated, or otherwise controlled activities at such facility immediately prior to such abandonment.

Person: an individual, firm, corporation, association, partnership, consortium, joint

[illegible] State or municipality or commission, political subdivision of a State, or any interstate body.

Release: any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment.

Site: the location at which hazardous wastes were stored, treated, or disposed of by persons required to notify under Section 103(c). This includes all contiguous land, structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous wastes. A site may consist of several treatment, storage, or disposal facilities.

Storage: the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, stored, or disposed elsewhere.

Transport or Transportation: the movement of a hazardous substance by any mode, including pipeline (as defined in the Pipeline Safety Act), and in the case of a hazardous substance which has been accepted for transportation by a common or contract carrier, the term "transport" or "transportation" shall include any stoppage in transit which is

[illegible] a common or contract carrier and any such stoppage shall be considered as continuous movement and not as the storage of a hazardous waste.

Treatment: any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste to neutralize such waste, or so as to recover energy or material resources from the waste, or to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of, or amenable for recovery, or storage, or reduced in volume. Such term includes any activity or processing designed to change the physical form or chemical composition of hazardous waste so as to render it nonhazardous.

Waste Quantity: the actual or estimated size of the area affected (such as square feet or acres) and/or amount of waste (such as gallons or cubic feet) for the various treatment, storage or disposal facilities used at a site.

Waste Type: the type of hazardous substance that has been treated, stored, or disposed at a site.

EPA

Official Business
Penalty for Private Use
$300

[illegible]
Postage and Fees Paid
EPA
Permit No. G-35

United States
Environmental Protection
Agency

Office of Hazardous
Emergency Response (WH-548)
Washington, DC 20460

Total Facility Waste Amount

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

2 ☐ Land Treatment
3 ☐ Landfill
4 ☐ Tanks
5 ☐ Impoundment
6 ☐ Underground Injection
7 ☐ Drums, Above Ground
8 ☐ Drums, Below Ground
9 ☐ Other (Specify) ____

Total Facility Area

square feet

acres 609

G Known, Suspected or Likely Releases to the Environment.

Place an X in the appropriate boxes to indicate any known, suspected or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☐ Likely ☐ None

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

H Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

SEE X ON ATTACHED MAP

I Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

INDUSTRIAL SITE

J Signature and Title

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing ... you are not required ...

Name E. Thoben, Mgr. Engr. & Maintenance

Street 1541 South Seventh Street

City Louisville State KY Zip Code 40208

Signature ____ Date ____

☐ Owner, Present
☐ Owner, Past
☒ Transporter
☐ Operator, Present
☐ Operator, Past
☐ Other

Generator

EPA Notification of Hazardous Waste Site

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response Compensation and Liability Act of 1980 and must be mailed by June 9, 1981

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

A Person Required to Notify

Enter the name and address of the person or organization required to notify

Name: American Standard, Inc.

Street: 1541 South 7th Street; P. O. Box 1050

City: Louisville, State: KY Zip Code: 40208

B Site Location:

Enter the common name (if known) and actual location of the site

Name of Site: K&B Body Shop/Bluegrass Pallet Co.

Street: 4642 Melton Ave./4632 Knopp Ave.

City: Louisville County: Jefferson State: KY Zip Code: 40219

C Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title): Thoben, Ed., Manager Engr. & Maint.

Phone: 502-637-7621

D Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site

Approximately

From Year: 1960 To Year: 1981

E Waste Type: Choose the option you prefer to complete

Option 1. Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I — Description of Site

General Type of Waste.
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1 ☐ Organics
2 ☐ Inorganics
3 ☐ Solvents
4 ☐ Pesticides
5 ☒ Heavy metals
6 ☐ Acids
7 ☐ Bases
8 ☐ PCBs
9 ☐ Mixed Municipal Waste
10 ☐ Unknown
11 ☐ Other (Specify)

Source of Waste:
Place an X in the appropriate boxes

1 ☐ Mining
2 ☐ Construction
3 ☐ Textiles
4 ☐ Fertilizer
5 ☐ Paper/Printing
6 ☐ Leather Tanning
7 ☐ Iron/Steel Foundry
8 ☐ Chemical, General
9 ☐ Plating/Polishing
10 ☐ Military/Ammunition
11 ☐ Electrical Conductors
12 ☐ Transformers
13 ☐ Utility Companies
14 ☐ Sanitary Refuse
15 ☐ Photofinish
16 ☐ [illegible]
17 ☐ [illegible]
18 ☒ Other (Specify)
Thermal Paint

Option 2. This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261)

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

D008		